

**NOT FOR PUBLICATION**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

MELISSA RHODES and WILLIAM  
RHODES,

Plaintiffs,

v.

MARIX SERVICING, LLC, *et al.*,

Defendants.

Civil Action No. 12-1636 (MAS) (DEA)

**MEMORANDUM OPINION**

**SHIPP, District Judge**

This matter comes before the Court upon two motions filed by Plaintiffs Melissa Rhodes and William Rhodes (collectively, “Plaintiffs”). First, is Plaintiffs’ Motion for Attorneys’ Fees Pursuant to Offer of Judgment of Defendant Zucker Goldberg & Ackerman (“ZGA”). (ECF No. 184.)<sup>1</sup> ZGA opposed (ECF No. 191) and Plaintiffs’ replied (ECF No. 194). The Court conducted oral argument on Plaintiff’s Motion for Attorneys’ Fees on February 7, 2019 (ECF No. 204) Also before the Court is Plaintiffs’ Motion to Quash/Compel/Enforce Settlement against Defendants EMC Mortgage Corporation (“EMC”) and Residential Credit Solutions, Inc. (“Residential”). (ECF No. 195.)<sup>2,3</sup> The Court declined to hear oral argument on Plaintiffs’ Motion to Enforce Settlement pursuant to Local Civil Rule 78.1. After carefully considering the parties

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<sup>1</sup> The Court hereinafter refers to this motion as “Plaintiffs’ Motion for Attorneys’ Fees.”

<sup>2</sup> The Court hereinafter refers to this motion as “Plaintiffs’ Motion to Enforce Settlement.”

<sup>3</sup> Marix Servicing, LLC (“Marix”) was previously a named Defendant in this matter.

positions, for the reasons set forth below, Plaintiffs' Motion for Attorneys' Fees is granted, as modified, in the amount of \$63,680.25, which includes \$59,396.88 in attorneys' fees, \$2,283.37 in expenses, and \$2,000.00 pursuant to the offer of judgment; and Plaintiffs' Motion to Enforce Settlement is denied without prejudice.

## **I. BACKGROUND**

The facts of this matter are well known to the parties and, therefore, the Court recounts only those facts necessary to resolve the instant motions. On May 31, 2018, pursuant to Rule 68 of the Federal Rules of Civil Procedure, ZGA made an offer of judgment (the "Offer of Judgment") to Plaintiffs stating, in relevant part,

[ZGA] hereby offers judgment to be entered against it and in favor of the Plaintiffs, in full satisfaction of their remaining claims as to ZGA as follows: One Thousand Dollars (\$1,000) to Melissa Rhodes and One Thousand Dollars (\$1,000) to William Rhodes, plus the costs of the action, together with a reasonable attorney's fee as determined by the Court and any allowable interest.

(Pls.' Acceptance of ZGA Offer 2, ECF No. 153.) Plaintiffs accepted ZGA's offer and filed a Notice of Acceptance of the Offer of Judgment on June 12, 2018. (*Id.* at 1.) On July 18, 2018, Plaintiffs settled their remaining claims with Marix, EMC, and Residential, and placed the terms of their settlement on the record. (ECF No. 182.) That same day, the Court administratively terminated the matter for 60 days, pending consummation of settlement. (ECF No. 183.)

On July 30, 2018, Plaintiffs filed their Motion for Attorneys' Fees. (Pls.' Mot. for Attorneys' Fees, ECF No. 184.) On October 31, 2018, after a series of adjournments, ZGA opposed (ECF No. 191), and on November 12, 2018 Plaintiffs replied (ECF No. 194). On December 28, 2018, Plaintiffs filed their Motion to Enforce Settlement. (Pls.' Mot. to Enforce, ECF No. 195.) On January 8, 2019, Marix filed a cross-motion to enforce settlement against Plaintiffs. (ECF

No. 196.) On February 7, 2019, the Court held oral argument on Plaintiffs' Motion for Attorneys' Fees. (ECF No. 204.)

On February 12, 2019, counsel for Marix filed letter correspondence informing the Court of a newly initiated Chapter 11 bankruptcy proceeding affecting Marix (the "Bankruptcy Proceeding"). (ECF No. 204.) In its correspondence, Marix averred that "this proceeding is stayed pursuant to United States Bankruptcy Code, 11 U.S.C. § 362." (*Id.*) The next day, the Court ordered Plaintiffs and ZGA to e-file correspondence regarding the impact of Marix's bankruptcy on Plaintiffs' Motion for Attorneys' Fees. (ECF No. 205.) On February 22, 2019, the Court administratively terminated this matter pending a resolution of the Bankruptcy Proceeding. (Feb. 22, 2019 Order, ECF No. 212). The Court further ordered that any party seeking to reopen the matter prior to the resolution of the Bankruptcy Proceeding could do so via formal motion. (*Id.*)

On July 11, 2019, Plaintiffs moved to re-open this matter. (ECF No. 213.) On July 22, 2019, ZGA submitted correspondence noting that, although it "disagreed with many of the characterizations provided by Plaintiffs with respect to [the] underlying facts[.]" it did not oppose the merits of Plaintiffs' motion to reopen. (ECF No. 214.) On July 24, 2019, EMC and Residential e-filed correspondence stating that they "disagree[d] with many of the statements made by Plaintiffs in this Motion" but did not object to the matter being reopened. (ECF No. 215.)

On December 6, 2019, Marix e-filed correspondence informing the Court that the underlying Bankruptcy Proceeding had been resolved and that the confirmed Chapter 11 plan included a "permanent injunction [] that specifically prohibits parties from prosecuting against [Marix] any claim for monetary recovery (including attorney's fees) . . . arising prior to September 30, 2019." (Marix Dec. 6, 2019 Correspondence, ECF No. 217.) Marix averred that "Plaintiffs must immediately dismiss . . . Counts One, Two, Three, Five, Six, and Seven of the Amended

Complaint” against Marix (*Id.* at 2.) Marix further argued that because it was “no longer the servicer of the loan at issue in this action, [it] is unable to grant the requested relief in Count Four of the [Amended] Complaint.” (*Id.*) Marix also requested it be terminated from this matter. (*Id.*)

On February 28, 2020, the Court granted Plaintiffs’ motion to reopen the case, reinstated Plaintiffs’ Motions for Attorneys’ Fees and to Enforce Settlement, and ordered Plaintiffs to show cause by March 13, 2020 as to why Marix’s request to be terminated from the case should not be granted. (Feb. 28, 2020 Order, ECF No. 218.) Plaintiffs did not respond to the Court’s Order. On June 15, 2020, the Court, upon review of its docket and upon consideration of Plaintiffs’ failure to respond to the Court’s February 28, 2020 Order, terminated Marix from the case without prejudice. (ECF No. 219.)

On July 2, 2020, Marix filed a copy of an order from the United States Bankruptcy Court for the Southern District of New York, entitled *Order Granting Plan Administrator’s Third Omnibus Motion to Enforce Injunctive Provisions of Plan and Confirmation Order*. (ECF No. 220.) The order, *inter alia*, bars Plaintiffs from continuing to maintain and prosecute claims for monetary damages against Marix that arose prior to September 26, 2019. (*See generally id.*)

## **II. LEGAL STANDARD**

Attorneys’ fees and costs “may be awarded to a prevailing party . . . where authorized by statute, court rule or contract.” *Apple Corps., Ltd. v. MI Collectors Soc’y*, 25 F. Supp. 2d 480, 484 (D.N.J. 1998). “A ‘prevailing’ plaintiff entitled to a fee award is one who has succeeded on any significant issue in litigation [that] achieves some of the benefit the part[y] sought in bringing the suit.” *Machado v. Law Offices of Jeffrey H. Ward*, No. 14-7401, 2017 WL 2838458, at \*1 (D.N.J. June 30, 2017) (citations and internal quotation omitted); *see also Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983)).

“The party seeking attorney[s’] fees has the burden to prove that its request for attorney[s’] fees is reasonable.” *Rode v. Dellarciprete*, 892 F.2d 1177, 1183 (3d Cir. 1990) “To meet its burden the fee petitioner must ‘submit evidence supporting the hours worked and rates claimed.’” *Id.* (quoting *Hensley*, 461 U.S. at 433). “The Supreme Court has held that ‘[t]he most useful starting point for determining the amount of a reasonable fee is the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Washington v. Phila. Cty. Court of Common Pleas*, 89 F.3d 1031, 1035 (3d Cir. 1996) (quoting *Hensley*, 461 U.S. at 433); *see also Rode*, 892 F.2d at 1183. “The result of this computation is called the lodestar.” *Washington*, 89 F.3d at 1035.

“Reasonable hourly rates are typically determined based on the market rate in the attorney’s community for lawyers of similar expertise and experience. *Machado*, 2017 WL 2838458, at \*2 (citing *Interfaith Cmty. Org. v. Honeywell Int’l, Inc.*, 426 F.3d 694, 712 (3d Cir. 2005), *as amended* (Nov. 10, 2005)). “The starting point in determining a reasonable hourly rate is the attorney’s usual billing rate, but this is not dispositive.” *Id.* (quoting *Pub. Int. Research Grp. of N.J., Inc. v. Windall*, 51 F.3d 1179, 1185 (3d Cir. 1995)). “After a court ascertains a reasonable hourly rate, it must then determine whether the hours that the attorney expended are reasonable.” *Id.* (citing *Hensley*, 461 U.S. at 433–34). The Court will exclude any hours that “were not reasonably expended” from the fee calculation. *Hensley*, 461 U.S. at 434 (citation omitted). “Hours are not reasonably expended if they are excessive, redundant, or otherwise unnecessary.” *Rode*, 892 F.2d at 1183. To determine whether the hours expended in this matter are reasonable, “it is necessary that the Court ‘go line, by line, by line’ through the billing records supporting the fee request.” *Evans v. Port Auth. of N.Y. & N.J.*, 273 F.3d 346, 362 (3d Cir. 2001) (emphasis in original)

When the fee petitioner has produced satisfactory evidence for a fee award, the burden shifts to “the party opposing the fee to contest the reasonableness of the hourly rate requested or the reasonableness of the hours expended.” *Apple Corps. Ltd. v. Int’l Collectors Soc’y*, 25 F. Supp. 2d 480, 485 (D.N.J. 1998). “If the party opposing the fee petition meets its burden of proving that an adjustment is necessary, the [C]ourt has wide discretion to adjust the attorneys’ fee . . . .” *Id.* (citation omitted); *see also Hensley*, 461 U.S. at 433 (noting determining reasonableness of fees is within the trial court’s discretion). Indeed, the Court “has wide discretion to adjust the attorneys’ fee for a variety of reasons such as inadequate documentation of hours spent, reasonableness of hours expended or duplication of efforts.” *Apple Corps. Ltd.*, 25 F. Supp. 2d at 485 (citing *Ursic v. Bethlehem Mines*, 719 F.2d 670, 677 (3d Cir. 1983)).

“The Court, however, must be prompted by the opposing party to review specific charges and cannot make any adjustments *sua sponte*.” *Machado*, 2017 WL 2838458, at \*2 (citing *Interfaith*, 426 F.3d at 711). “The lodestar calculation is presumed reasonable, but the ‘[C]ourt can adjust the lodestar downward if the lodestar is not reasonable in light of the results obtained.’” *Id.* (quoting *Washington*, 89 F.3d at 1035).

### **III. PARTIES’ POSITIONS**<sup>4</sup>

Plaintiffs’ Motion for Attorneys’ Fees seeks a total award of \$141,544.27, which consists of: (1) attorneys’ fees in the amount of \$102,330.83; (2) a one-third enhancement of fees in the amount of \$34,110.28; (3) expenses in the amount of \$3,103.16; and (4) \$2,000.00 pursuant to the Offer of Judgment. (Pls.’ Fees Moving Br. 17–18, ECF No. 184-4.) Plaintiffs request the use of the following hourly rates for the Court’s lodestar calculation: (1) William P. Rubley at \$300.00

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<sup>4</sup> Because the Court denies Plaintiffs’ Motion to Enforce Settlement without prejudice, as discussed in Section IV.G., *infra*, the Court declines to recount the Plaintiffs’ arguments in support of their motion here.

per hour; (2) Scott M. Zauber at \$300.00 per hour; (3) John P. Leon at \$300.00 per hour; (4) Anthony J. Canale at \$250.00 per hour; (5) Michael P. Morrow at \$150.00 per hour; and (6) paralegals at \$125.00 per hour. (*Id.* at 10.) Plaintiffs aver that their time records properly document the time expended in the matter, and that their requested hourly rates are reasonable based on the fee schedule established by Community Legal Services of Philadelphia (“CLS”). (*Id.* at 10–11.) As to their requested expenses, Plaintiffs aver that their request is reasonable and that their request “[has] been appropriately discounted to reflect the share of expenses that is fairly attributable to [ZGA].” (*Id.* at 12–13.)

Plaintiffs argue that they are entitled to an upward adjustment of the lodestar calculation because “the hourly rates do not adequately reflect market value and because of the exceptionally protracted limitation and unanticipated delays in payment of fees.” (*Id.* at 13.) Plaintiffs contend that their hourly rates were below the CLS guidelines and, accordingly, they were below market value and entitle them to an upward adjustment. (*Id.* at 14–15.) As to the unexpected delays, Plaintiffs note that this litigation has been pending since March 15, 2012 and had only been scheduled to go to trial on July 25, 2018. (*Id.* at 16.) Plaintiffs contend that “a major factor in that delay” was ZGA’s bankruptcy filing which occurred on August 3, 2015, “after discovery had been completed and a final pretrial conference had been set.” (*Id.*) Plaintiffs also note that ZGA opposed Plaintiffs’ previous motion to reopen this case after Plaintiffs were granted relief from the automatic stay imposed by ZGA’s bankruptcy, requiring Plaintiffs to incur additional expenses from the subsequent motion practice. (*Id.* at 16–17.) Plaintiffs, accordingly, request a one-third enhancement of the lodestar amount of fees. (*Id.* at 17.)

ZGA advances several arguments in opposition. First, ZGA argues the Court should deny Plaintiffs' Motion for Attorneys' Fees because Plaintiffs failed to comply with Local Civil Rule 54.2. (ZGA Opp'n Br. 14, ECF No. 191.) Local Civil Rule 54.2(a) states, in relevant part,

In all actions in which a counsel fee is allowed by the Court or permitted by statute, an attorney seeking compensation for services or reimbursement of necessary expenses shall file within 30 days of the entry of judgment or order, unless extended by the Court, a motion for fees and expenses in accordance with L. Civ. R. 7.1.

L. Civ. R. 54.2(a). ZGA contends that, because Plaintiffs accepted the Offer of Judgment on June 12, 2018, they had until July 12, 2018 to seek a fee award. (ZGA Opp'n Br. 14.) Because Plaintiffs' did not file their Motion for Attorneys' Fees until July 30, 2018, ZGA argues that the Motion is untimely and should be denied. (*Id.*) ZGA similarly argues that the Motion should be denied because the documentation submitted by Plaintiffs is inadequate (*Id.* at 15.)

ZGA further contends that Plaintiffs "cannot satisfy their heavy burden to establish that the fees incurred were reasonable" and that granting Plaintiffs' Motion for Attorneys' Fees would result in an impermissible "windfall" to Plaintiffs' counsel. (*Id.* at 13, 15.) As to Plaintiffs' requested enhancement, ZGA argues that Plaintiffs failed to demonstrate "rare" or "exceptional" facts that would permit a fee enhancement. (*Id.* at 22.) Further, ZGA argues Plaintiffs contributed to the matter's delay, and that Plaintiffs are trying to penalize ZGA for filing for bankruptcy when it was merely seeking to exercise the "legal and statutory rights afforded to it." (*Id.* at 24.)

Moreover, regarding general billing entries that pertained to all Defendants, Plaintiffs attributed 33.3% of those billing entries to ZGA, which ZGA contends is arbitrary and, at the very least, the share of the entries attributable to ZGA should be reduced to 25% because ZGA was one of four named Defendants. (*Id.* at 26.)



ZGA also argues Plaintiffs submitted a number of entries related to efforts to educate themselves about specific claims, and many of those billing entries are duplicative, not recoverable to a client, and therefore inappropriate for a fee application. (*Id.* at 19–22.) ZGA further disputes billing entries for individuals whom Plaintiffs did not reference or describe in their fee application or attendant briefs. (*Id.* at 20.) Finally, ZGA contends that Plaintiffs are seeking fees for claims on which they were not, or were only marginally, successful. (*Id.* at 20–21.) Accordingly, ZGA argues that if the Court awards attorneys’ fees to Plaintiffs, a reasonable sum would be \$9,263.59, which should be further reduced in accordance with the 33% to 25% apportionment ZGA contends is appropriate. (*Id.* at 18–19.)

In reply, Plaintiffs argue a three-way apportionment of fees is appropriate because two Defendants—EMC and Residential—were represented by common counsel. (Pls.’ Fee Reply Br. 1 n.1, ECF No. 194.) Plaintiffs contend that the hours expended, 948.7, are reasonable because this matter was litigated for nearly 90 months and because that number equates to roughly 10.5 hours per month. (*Id.* at 2.) Plaintiffs note that the figure proposed in ZGA’s opposition brief—an award of roughly \$9,000 in fees—“would yield a rate of about \$9.50 per hour for the 948.7 hours of work performed” and that “[n]o reasonable person could conclude” such a figure was adequate compensation. (*Id.* at 3.) Plaintiffs further argue that ZGA violated the Fair Debt Collection Practices Act (“FDCPA”) in multiple ways when it sent a Notice of Intent to Foreclose to Plaintiffs and that “[b]ut for this litigation,” Plaintiffs likely would have lost their home. (*Id.* at 6–7.)

#### **IV. DISCUSSION**

As a preliminary matter, the Court finds that the Offer of Judgment entitles Plaintiffs to reasonable attorneys’ fees, Plaintiffs’ Motion seeking these fees was timely, and Plaintiffs have provided sufficient detail to support their request for fees.

ZGA contends that, because Plaintiffs accepted the Offer of Judgment on June 12, 2018, they had until July 12, 2018 to seek a fee award and that because Plaintiffs' did not file their Motion for Attorneys' Fees until July 30, 2018 the Motion is untimely and should be denied. (ZGA Opp'n Br. 14.) The Court disagrees. Local Civil Rule 54.2(a) states that "an attorney seeking compensation for services or reimbursement of necessary expenses shall file *within 30 days of the entry of judgment or order.*" L. Civ. R. 54.2(a) (emphasis added). Although the Plaintiffs accepted the Offer of Judgment on June 12, 2018 and filed their acceptance on the docket, the Clerk of the Court never entered judgment and, therefore, the 30-day timer never started to run. Plaintiffs' Motion for Attorneys' Fees is therefore timely.

Finally, ZGA contends that the spreadsheet Plaintiffs submitted in support of their fee application ("Plaintiffs' Spreadsheet") is insufficient to support the requested fee award. (ZGA Opp'n Br. 18–22, 25–26.) Although some entries lack adequate specificity, which the Court addresses below, the Court otherwise finds Plaintiffs' Spreadsheet sufficiently detailed to perform a thorough analysis. (Pls.' Spreadsheet, Ex. A to Pls.' Fees Moving Br., ECF No. 184-2); *see, e.g., Avaya, Inc. v. Telecom Labs*, No. 06-2490, 2016 WL 223696, at \*4 (D.N.J. Jan. 19, 2016) ("[S]ufficiently detailed summaries may be appropriate for fee applications . . . ."); *see also Rode*, 892 F.2d at 1190 ("A fee petition is required to be specific enough to allow the district court to determine if the hours claimed are unreasonable for the work performed.") (internal quotations omitted).

#### **A. The Hourly Rates Suggested by Plaintiffs Are Reasonable**

Plaintiffs have demonstrated that their hourly rates are reasonable, as they are within, or below, the ranges set forth in the CLS fee schedule. "The fee schedule established by Community Legal Services, Inc. ("CLS") 'has been approvingly cited by the Third Circuit as being well

developed and has been found . . . to be a fair reflection of the prevailing market rates.”  
*Maldonado v. Houstoun*, 256 F.3d 181, 187 (3d Cir. 2001) (quoting *Rainey v. Philadelphia Housing Auth.*, 832 F.Supp. 127, 129 (E.D. Pa. 1993)). The Court, therefore, is satisfied that Plaintiffs’ hourly rates are reasonable.

**B. Plaintiffs’ Erred By Attributing 33.33% of Shared Costs to ZGA**

For general billing entries that pertained to all Defendants, Plaintiffs attributed 33.33% of the entries to ZGA. ZGA contends this apportionment is arbitrary, and at the very least, the share of the entries attributable to ZGA should be reduced to 25% because ZGA was one of four named Defendants. (*Id.* at 26.) The Court agrees. There were four Defendants in this matter, and the Court is not persuaded by Plaintiffs’ argument that ZGA should be held accountable for a larger share simply because common counsel represented EMC and Residential. The Court, accordingly, downwardly adjusts all billing entries that attributed 33.33% of the costs to ZGA so that they now attribute 25%. (*See generally* Court’s Spreadsheet.)<sup>5</sup>

**C. The Court Reviews Plaintiffs’ Spreadsheet Line-By-Line, Finds Certain Requests Are Not Reasonable, and Accordingly Rejects Specific Entries**

The Court further finds Plaintiffs are not entitled to certain entries included in Plaintiffs’ Spreadsheet, for the reasons enumerated below. The Court addresses each in turn. In so doing, the Court, in large part, adopts Plaintiffs’ Spreadsheet’s format in addressing the reasonableness of the hours expended. Plaintiffs’ Spreadsheet included the following column headers: (A) Date; (B) Staff; (C) Service Performed; (D) Time; (E) Cost; (F) Fee/Expense; (G) Percentage; and (H) Amount Attributable to ZGA. (Pls.’ Spreadsheet 1.) Plaintiffs, however, did not include individualized row numbers or any other unique identifier that could be used to differentiate

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<sup>5</sup> The Court’s Spreadsheet is appended to the end of this Memorandum Opinion. The formatting and contents of the Court’s Spreadsheet are discussed in Section IV.C., *infra*.

between various entries. The Court, in generating the Court's Spreadsheet, subsequently converted the provided .pdf document into a Microsoft Excel .xlsx file, and inserted a column to the left of the existing Column A. (*See generally* Court's Spreadsheet.) In the Court's Spreadsheet, each row of data has a corresponding "Row Number" that acts as a unique identifier. The numerals in the "Row Number" column begin with the first row of data and do not include the column headers provided by Plaintiffs. The references below act as if Plaintiffs presented the data using the following column headings: (A) Row Number; (B) Date; (C) Staff; (D) Service Performed; (E) Time; (F) Cost; (G) Fee/Expense; (H) Percentage; and (I) Amount Attributable to ZGA. (*Compare* Pls.' Spreadsheet *with* Court's Spreadsheet.)

## 1. An Unfiled Motion for Default Judgment

Plaintiffs' Spreadsheet includes a billing entry for preparation of a default judgment. Plaintiffs, however, never filed such a motion, and Plaintiffs' Motion and attendant briefs fail to address why Plaintiffs are entitled to fees for preparing that motion. The Court, therefore, declines to award Plaintiffs the following fees:

Row #	Date	Staff	Service Performed	Time	Cost	Fee/Expense	%	Amount Attributable to ZGA
44	7/11/2012	WPR	Prepare the Default judgments against Mariz and default Zucker Goldberg.	2.5	\$750.00	Fee	50.00%	\$375.00

## 2. Unidentified Persons

Plaintiffs' application includes billing entries for individuals whom Plaintiffs fail to explain who they are or how they were involved in the underlying litigation. For example, numerous entries reference "counsel in New York" or "Eric Browndorf," but there is no counsel from New York or an Eric Browndorf listed on the docket. These billing entries, therefore, lack proper documentation and specificity for the Court to perform an adequate review. Plaintiffs, accordingly, failed to demonstrate that their charges related to unidentified individuals are reasonable or

recoverable.<sup>6</sup> See, e.g., *UAW Local 259 Soc. Sec. Dep't v. Metro Auto Ctr.*, 501 F.3d 283, 291 (3d Cir. 2007) (“In requesting, challenging, and granting attorneys’ fees, specificity is critical.”). The Court, therefore, declines to award Plaintiffs fees for the following entries associated with unidentified individuals:<sup>7</sup>

Row #	Date	Staff	Service Performed	Time	Cost	Fee/Expense	%	Amount Attributable to ZGA
59	9/10/2012	WPR	E-mails with counsel in New York; review all documents for the pre-trial conference in the morning.	1	\$300.00	Fee	33.33%	\$100.00
76	10/18/2012	WPR	Conference call with the Judge; review e-mail from NY class action counsel.	0.4	\$120.00	Fee	33.33%	\$40.00
160	5/7/2013	SMZ	Discussion with Eric Browndorf re basic strategy for mediation.	0.5	\$150.00	Fee	33.33%	\$50.00
164	5/7/2013	WPR	Multiple telephone calls and e-mails with Judge Rosen, Judge Arpert, secretary for Judge Rosen and all parties to the case; telephone call with co-counsel Eric Browndorf.	2.2	\$660.00	Fee	33.33%	\$220.00
170	5/13/2013	WPR	Prepare e-mail to Eric Browndorf.	0.2	\$60.00	Fee	33.33%	\$20.00
178	5/16/2013	WPR	Conference call with Eric Browndorf; meet with Scott Zauber.	0.8	\$240.00	Fee	33.33%	\$80.00
202	8/19/2013	WPR	Review the opinion and order on the Motion to Compel; e- mail the same to Browndorf; telephone call with the client.	1.5	\$450.00	Fee	50.00%	\$225.00
229	9/27/2013	SMZ	Conference with Will Rubley re discussion regarding case and conference call with Eric Browndorf.	0.5	\$150.00	Fee	33.33%	\$50.00
233	9/30/2013	WPR	Telephone call with counsel for LPS and review documents with counsel regarding LPS Default Solutions; search for LPS Default Solutions and claims against LPS and Al Evans.	1.9	\$570.00	Fee	33.33%	\$190.00

<sup>6</sup> That these entries lack specificity is underscored by ZGA having to assume Plaintiffs’ actions were to educate themselves. (See ZGA Opp’n Br. 20 (“These entries appear to be with counsel that specializes in FDCPA claims and class actions. However, no New York counsel ever appeared here, nor did Mr. Browndorf. Nonetheless, Plaintiffs seek time for consulting with another attorney presumably to educate themselves.”).)

<sup>7</sup> The Court acknowledges that some billing entries include fees for both identified and unidentified individuals. The Court, however, declines to reduce those billing entries because Plaintiffs have not submitted documentation indicating how much time was spent performing each task, and to reduce those awards would require the Court to arbitrarily allot time to each action. See, e.g., *United States ex rel. Palmer v. C&D Techs., Inc.*, 897 F.3d 128, 139 (3d Cir. 2018) (citation omitted) (“[D]istrict Courts, in awarding attorneys’ fees, may not reduce an award by a particular percentage or amount (albeit for justifiable reasons) in an arbitrary or indiscriminate fashion.”).

236	10/1/2013	WPR	Meeting with Browndorf, Thorton, and Zauber.	3	\$900.00	Fee	33.33%	\$300.00
256	11/5/2013	WPR	Telephone call with LPS Default Solutions in-house counsel regarding the responses to the subpoenas; pull research on the individual known as Al Evans at LPS Default Solutions; pull research on subpoena of a non-party employee of a non-party for a deposition here in NJ.	1	\$300.00	Fee	33.33%	\$100.00
526	12/19/2014	WPR	Meet with Sidelsky; review the electric bill from the client; initial review of the Motion for Financing of the Insurance Premiums.	0.5	\$150.00	Fee	33.33%	\$50.00
620	1/12/2017	WPR	Telephone message for Adler.	0.1	\$25.00	Fee	100.00%	\$25.00

### 3. Unsuccessful Motions

Courts are permitted to downwardly adjust a plaintiff's fee application to reflect the plaintiff's limited success. *See, e.g., Hensley*, 461 U.S. at 436–37. “There is no precise rule or formula,” however, for determining whether a fee award is reasonable. *Id.* at 436. In those circumstances, “[t]he [D]istrict [C]ourt may attempt to identify specific hours that should be eliminated, or it may simply reduce the award to account for the limited success. The [C]ourt necessarily has discretion in making this equitable judgment.” *Id.* at 436–37. Courts, however, must also consider the “interrelated nature of the lawsuit as a whole.” *Williams v. Tri-Cty. Growers, Inc.*, 747 F.2d 121, 137 (3d Cir. 1984).

Here, the Court recognizes the interrelated nature of Plaintiffs' claims, and that “but for this litigation” Plaintiffs would have lost their home. The Court, however, finds that ZGA's involvement in this action was peripheral to the corpus of the litigation, and Plaintiffs were only partially successful overall. In fact, only two of the eight counts in Plaintiffs' Second Amended Complaint pertained to ZGA, and of those two counts, Plaintiffs only obtained an offer of judgment as to the FDCPA claim. The Court, therefore, finds it appropriate to strike billing entries related to issues that were unsuccessful, including: (1) Motion to Withdraw Reference; (2) Motion for Attorneys' Fees, filed before the Honorable Douglas E. Arpert, U.S.M.J. (ECF No. 47); (3)

Settlement and Enforcing Settlement; and (4) Summary Judgment. The Court will address each in turn.

**i. Motion to Withdraw Reference**

Plaintiffs' Spreadsheet includes billing entries for a motion to withdraw a bankruptcy reference that this Court previously found was improperly filed. (*See In re Zucker, Goldberg & Ackerman, LLC*, No. 15-7466, ECF No. 5 ("The Rhodes Action was never 'referred' to the Bankruptcy Court, and thus, there is nothing for this Court to withdraw reference to. If the relief Plaintiffs seek is that the Rhodes Action be 'reopened' . . . they should file the appropriate motion in the Rhodes Action . . .").) Because Plaintiffs were unsuccessful (and improperly filed) that motion, the Court declines to award attorneys' fees for the following entries:

Row #	Date	Staff	Service Performed	Time	Cost	Fee/Expense	%	Amount Attributable to ZGA
587	8/20/2015	WPR	Pull research on Motion to Vacate Reference.	2.5	\$750.00	Fee	100.00%	\$750.00
588	9/2/2015	WPR	Continue to research motions to withdraw the reference.	2.6	\$780.00	Fee	100.00%	\$780.00
589	9/14/2015	WPR	Continue to draft the Motion to Withdraw the Reference.	2	\$600.00	Fee	100.00%	\$600.00
591	9/29/2015	WPR	[CS] Conduct legal research on the withdraw of reference from Bankruptcy.	2	\$400.00	Fee	100.00%	\$400.00
592	9/30/2015	WPR	[CS] Prepare motion to withdraw reference.	4	\$800.00	Fee	100.00%	\$800.00
593	10/5/2015	WPR	[CS] Discuss same with Will Rubley.	0.3	\$60.00	Fee	100.00%	\$60.00
594	10/5/2015	WPR	[CS] Conduct additional research on the mandatory withdraw of the reference.	1	\$200.00	Fee	100.00%	\$200.00
595	10/5/2015	WPR	[CS] Make necessary corrections and additions to the memorandum of law in support of the motion.	3	\$600.00	Fee	100.00%	\$600.00
596	10/6/2015	WPR	Review the Motion to withdraw the Reference.	2.2	\$660.00	Fee	100.00%	\$660.00
597	10/8/2015	WPR	[CS] Final review the motion to withdraw. Review citations and shepardize case law. Prepare table of contents and table of authorities.	4.5	\$900.00	Fee	100.00%	\$900.00
598	10/8/2015	WPR	Call with the bankruptcy court.	0.3	\$90.00	Fee	100.00%	\$90.00
599	10/8/2015	WPR	Final review of the Motion to Withdraw the Reference.	1.5	\$450.00	Fee	100.00%	\$450.00
600	10/9/2015	WPR	[CS] Prepare letter to Judge Shipp enclosing copy of the motion to withdraw reference. Organize motion and exhibits to send to Judge.	0.6	\$120.00	Fee	100.00%	\$120.00

601	10/9/2015	WPR	Review the rules for service of the Motion to Withdraw the Reference.	0.4	\$120.00	Fee	100.00%	\$120.00
602	10/15/2015	WPR	[CS] Review Zucker's response to Rhodes' motion to withdraw.	0.2	\$40.00	Fee	100.00%	\$40.00
603	10/15/2015	WPR	Review the opposition to the Motion to Withdraw the reference. Pull cases on related to jurisdiction of the bankruptcy court and prepare the reply.	2.5	\$750.00	Fee	100.00%	\$750.00
604	10/16/2015	WPR	Finalize the reply to the Motion to Withdraw the reference and file the same.	1.5	\$450.00	Fee	100.00%	\$450.00
606	11/23/2015	WPR	Review the order from the district court denying the Motion to Withdraw the Reference.	0.5	\$150.00	Fee	100.00%	\$150.00
765	10/12/2015	SMZ	Filing fee for Motion to Withdraw Reference.	Flat Exp	\$176.00	Expense	33.33%	\$58.67

## ii. Attorneys' Fees Motion before Judge Arpert

Plaintiffs' application also includes billing entries for an attorneys' fees motion before Judge Arpert, which Judge Arpert denied. (ECF No. 54.) The Court, therefore, declines to award Plaintiffs attorneys' fees for the following entries:

Row #	Date	Staff	Service Performed	Time	Cost	Fee/Expense	%	Amount Attributable to ZGA
208	9/4/2013	WPR	Begin to prepare the Motion for fees and costs; pull research on the Lodestar Analysis.	1.7	\$510.00	Fee	50.00%	\$255.00
221	9/19/2013	WPR	Pull research on post-petition attorney's fees in bankruptcy and whether they need to be approved by the bankruptcy court in order to be considered due and owing.	1.5	\$450.00	Fee	33.33%	\$150.00
228	9/26/2013	WPR	Review research and prepare the Motion for Attorneys Fees and Costs.	3.8	\$1,140.00	Fee	50.00%	\$570.00
230	9/27/2013	WPR	File the Motion for Fees; e-mails with Sayles regarding the motions.	0.7	\$210.00	Fee	50.00%	\$105.00
234	9/30/2013	WPR	Pull research on post-petition attorneys fees by secured creditor and violation of discharge injunctions; continue to review the notes from Marix and the e-mails and communications from Zucker to LPS Default Solutions.	1.1	\$330.00	Fee	33.33%	\$110.00

## iii. Settlement, Mediation, and Enforcing Settlement

The parties' multiple failed settlement attempts greatly contributed to this matter's tortured history. The parties first attended a settlement conference before Judge Arpert on May 15, 2014, which was unsuccessful. (*See* Docket Entry for May 15, 2014.) Subsequently, on October 8, 2014,



the parties attended another settlement conference before the Undersigned that appeared successful, and the Court entered an order dismissing the case without prejudice. (ECF No. 82.)

On November 26, 2014, Plaintiffs filed a Motion to Reopen the Case,<sup>8</sup> which resulted in motion practice related to enforcing the settlement, as well as another round of settlement conferences before the Undersigned. (*See* Docket Entry for Feb. 18, 2015.) When that settlement conference failed, the Court reopened the matter and reinstated the pending summary judgment motions. (ECF No. 102.) The Court then held another settlement conference on April 4, 2018, and Plaintiffs submitted a Notice of Acceptance of Offer of Judgment by ZGA on June 12, 2018. (ECF No. 153.) Thus, the majority of those settlement attempts were unsuccessful, and the settlement offer Plaintiffs did ultimately accept was for a significantly reduced recovery than they were originally seeking. *See, e.g., Berne Corp. v. Gov't of the V.I.*, No. 2001-141, 2012 U.S. Dist. LEXIS 13128, at \*27 (D.V.I. Feb. 3, 2012) (declining to award the plaintiffs attorneys' fees for failed settlement attempts, stating, *inter alia* "it is not clear whether the [p]laintiffs' participation in these efforts were useful and necessary to secure the final result obtained . . .").

The Court, accordingly, declines to award attorneys' fees for the following entries:

Row #	Date	Staff	Service Performed	Time	Cost	Fee/Expense	%	Amount Attributable to ZGA
58	9/7/2012	WPR	E-mails with the client and send offer to settle to Zucker.	0.5	\$150.00	Fee	100.00%	\$150.00
152	5/1/2013	WPR	Continue to prepare the mediation statement; e-mails with Judge Rosen's office; send e-mail to client.	3	\$900.00	Fee	33.33%	\$300.00
153	5/2/2013	WPR	Finalize the mediation statement and send the same with all exhibits to Judge Rosen; review the credit report of the client; send credit report to all parties; prepare e-mail to counsel for EMC regarding outstanding discovery; e-mail to counsel in NY.	3.5	\$1,050.00	Fee	33.33%	\$350.00

<sup>8</sup> Plaintiffs' settlement dispute pertained to two other Defendants, but because that settlement "was part of the overall settlement package with all parties" Plaintiffs argued "there c[ould] be no meeting of the minds with the remaining Defendants," which included ZGA. (Pls.' Cross-Motion to Enforce Settlement Opp'n Br. 7, ECF No. 94.)

154	5/3/2013	SMZ	Conference with Will Rubley re discussion regarding strategy, mediation, trial counsel and class action status.	1.2	\$360.00	Fee	33.33%	\$120.00
158	5/6/2013	SMZ	Discussion with Will Rubley on file and preparation for mediation.	1.5	\$450.00	Fee	33.33%	\$150.00
161	5/7/2013	SMZ	Mediation preparation with Will Rubley and discussion with client.	1.5	\$450.00	Fee	33.33%	\$150.00
162	5/7/2013	SMZ	Telephone conference with Will Rubley re various discussions regarding proceeding forward with mediation and parties not attending.	0.5	\$150.00	Fee	33.33%	\$50.00
163	5/7/2013	WPR	Telephone call with the client to prepare for mediation.	0.5	\$150.00	Fee	33.33%	\$50.00
165	5/7/2013	WPR	Pull documents and prepare for the mediation; review all discovery; send credit report to all parties as supplement to answers to discovery.	1.3	\$390.00	Fee	33.33%	\$130.00
166	5/8/2013	SMZ	Multiple telephone conferences with Will Rubley re settlement conference discussions with client and Will at conference.	0.5	\$150.00	Fee	33.33%	\$50.00
333	2/21/2014	SMZ	Conference with Will Rubley re settlement discussion with client.	0.5	\$150.00	Fee	33.33%	\$50.00
334	2/21/2014	WPR	Telephone call with the client and then e-mail to all parties concerning settlement.	0.5	\$150.00	Fee	33.33%	\$50.00
346	3/2/2014	WPR	Telephone call with Zauber regarding possible settlement.	0.6	\$180.00	Fee	33.33%	\$60.00
347	3/3/2014	SMZ	Telephone conference with Will Rubley re settlement discussion.	0.5	\$150.00	Fee	33.33%	\$50.00
379	3/24/2014	WPR	E-mail all parties regarding conference call; set up the conference call with the court; prepare e-mail to Judge Rosen's office and e-mail all parties regarding mediation; prepare e-mail to the client re mediation.	0.4	\$120.00	Fee	33.33%	\$40.00
423	5/8/2014	WPR	Begin to prepare the settlement memorandum.	1.5	\$450.00	Fee	33.33%	\$150.00
424	5/12/2014	WPR	Finalize and file the confidential settlement memo with the court.	3.5	\$1,050.00	Fee	33.33%	\$350.00
428	5/13/2014	WPR	Review the billing records in anticipation of the settlement conference.	1	\$300.00	Fee	33.33%	\$100.00
431	5/15/2014	SMZ	Travel to and appearance at mediation with Judge Arpert.	4	\$1,200.00	Fee	33.33%	\$400.00
432	5/15/2014	SMZ	Conference with Will Rubley re discussion about case after mediation/file update.	0.5	\$150.00	Fee	33.33%	\$50.00
433	5/15/2014	SMZ	Preparation for mediation/meeting with Will Rubley.	0.5	\$150.00	Fee	33.33%	\$50.00
434	5/15/2014	WPR	Travel to and attend the settlement conference before Judge Arpert.	4	\$1,200.00	Fee	33.33%	\$400.00
435	5/15/2014	WPR	Review the settlement memo and the pleadings and the summary judgment memos as preparation for the settlement conference.	1	\$300.00	Fee	33.33%	\$100.00
494	9/19/2014	SMZ	Conference with Will Rubley re strategy session on mediation and going forward.	0.7	\$210.00	Fee	33.33%	\$70.00
496	9/29/2014	WPR	Review the settlement memorandum to Judge Shipp.	0.5	\$150.00	Fee	33.33%	\$50.00

497	9/30/2014	SMZ	Conference with Will Rubley re discussion about settlement conference and submission.	0.7	\$210.00	Fee	33.33%	\$70.00
498	9/30/2014	WPR	Make changes to the Settlement Agreement.	0.4	\$120.00	Fee	33.33%	\$40.00
499	10/1/2014	JPL	Review and revise letter to judge re settlement conference (history of case and issues etc.)	0.3	\$90.00	Fee	33.33%	\$30.00
500	10/1/2014	WPR	Finalize the settlement letter to Judge Shipp and fax the same to the Judge's chambers.	1	\$300.00	Fee	33.33%	\$100.00
502	10/7/2014	WPR	Final preparation for the settlement conference; telephone call with the client.	2.1	\$630.00	Fee	33.33%	\$210.00
503	10/8/2014	WPR	Travel to and attend the Settlement Conference with Judge Shipp.	7.5	\$2,250.00	Fee	33.33%	\$750.00
504	10/10/2014	WPR	Begin to prepare the settlement documents.	1.8	\$540.00	Fee	33.33%	\$180.00
505	10/15/2014	WPR	Continue to prepare the settlement documents; e-mails to and from the client.	1.2	\$360.00	Fee	33.33%	\$120.00
507	10/27/2014	WPR	Continue to prepare the settlement agreements.	0.8	\$240.00	Fee	33.33%	\$80.00
508	10/28/2014	WPR	Continue to prepare the settlement agreements.	1.2	\$360.00	Fee	33.33%	\$120.00
509	11/3/2014	WPR	Continue drafting the settlement agreements; e-mail with Kelner.	2.5	\$750.00	Fee	33.33%	\$250.00
510	11/4/2014	WPR	Finalize the settlement agreements and send the same to all parties.	3.6	\$1,080.00	Fee	33.33%	\$360.00
518	11/25/2014	WPR	[CS] Conduct legal research on motion to enforce settlement; conduct legal research on motion to reopen case after an Order dismissing the action without prejudice was entered by the court; prepare Motion to Reopen Case.	4.5	\$900.00	Fee	33.33%	\$300.00
525	12/19/2014	WPR	Initial review of the Cross Motion to Enforce Settlement.	1	\$300.00	Fee	33.33%	\$100.00
527	12/22/2014	WPR	Pull research on the Cross Motion to Approve Settlement.	1.3	\$390.00	Fee	33.33%	\$130.00
528	1/3/2015	WPR	Pull research on the Motion to Enforce Settlement.	2.5	\$750.00	Fee	33.33%	\$250.00
529	1/5/2015	WPR	Continue to draft the response to the cross motion to enforce settlement.	3.5	\$1,050.00	Fee	33.33%	\$350.00
530	1/6/2015	WPR	Continue to pull research on the settlement of certain claims against certain defendants when the claims are co-dependent on non-settling claims.	2.2	\$660.00	Fee	33.33%	\$220.00
532	1/6/2015	WPR	Review the Motion to Enforce Settlement by Zucker.	1.9	\$570.00	Fee	100.00%	\$570.00
533	1/7/2015	WPR	Continue to research motions to approve settlement and to prepare the opposition to the same.	4.5	\$1,350.00	Fee	33.33%	\$450.00
534	1/8/2015	WPR	Continue to draft opposition to the Motions to Enforce Settlement.	1.3	\$390.00	Fee	33.33%	\$130.00
535	1/9/2015	WPR	Continue to draft the Response to the Motion to Enforce Settlements.	2.6	\$780.00	Fee	33.33%	\$260.00
548	2/16/2015	WPR	Continue research on the empty chair defense; draft letter to Judge Shipp regarding settlement conference.	1.8	\$540.00	Fee	33.33%	\$180.00

550	2/18/2015	WPR	[CS] Telephone conference with Will Rubley to discuss terms of settlement with Marix and Zucker.	0.1	\$20.00	Fee	50.00%	\$10.00
552	2/18/2015	SMZ	Travel to and appearance at settlement conference.	3	\$900.00	Fee	33.33%	\$300.00
554	2/18/2015	WPR	Travel to and attend the settlement conference before Judge Shipp.	4.1	\$1,230.00	Fee	33.33%	\$410.00
555	2/22/2015	WPR	Begin to prepare the responses to the Motions to Enforce Settlement.	1.8	\$540.00	Fee	33.33%	\$180.00
556	2/25/2015	WPR	Review outstanding discovery from EMC and Residential and review status of the case in light of the failed settlement.	2.4	\$720.00	Fee	33.33%	\$240.00
557	2/27/2015	WPR	Continue to draft the opposition to the Motion to Enforce Settlement.	2.2	\$660.00	Fee	33.33%	\$220.00
558	2/28/2015	WPR	Continue to draft the opposition to the cross motions to settle or to enforce settlement.	2.8	\$840.00	Fee	33.33%	\$280.00
559	3/2/2015	WPR	Continue to draft the Opposition to the three Motions to Enforce Settlement.	3.5	\$1,050.00	Fee	33.33%	\$350.00
560	3/3/2015	WPR	Finalize the opposition to the three cross motions to enforce settlement and file the same; send a courtesy copy to Judge Shipp.	4.6	\$1,380.00	Fee	33.33%	\$460.00

#### iv. Summary Judgment

On March 20, 2018, the Court addressed the parties' competing dispositive motions, which included: (1) Plaintiffs' Motion for Partial Summary Judgment, (ECF No. 59); (2) ZGA's Cross-Motion to Strike Portions of Plaintiffs' Motion for Summary Judgment, (ECF No. 76); (3) EMC and Residential's Motion for Summary Judgment, (ECF No. 58); and (4) ZGA's Motion for Summary Judgment, (ECF No. 60). (Mar. 20, 2018 Op., ECF No. 132.) In its Memorandum Opinion, the Court denied Plaintiffs' Motion for Partial Summary Judgment. (*Id.* at 8.) The Court also denied [ZGA's] cross-motion because it would be "too drastic a remedy . . . ." (*Id.* at 12.) The Court noted, however, that "Plaintiffs should have supplemented their discovery responses during the course of discovery," but after balancing the parties' interests, allowed Plaintiffs' claims to remain. (*Id.*) The Court further granted in part and denied in part ZGA's Motion for Summary Judgment. (*Id.* at 15–20.)

Here, the Court finds Plaintiffs erred in including entries pertaining to their unsuccessful Motion for Summary Judgment. Additionally, the Court finds Plaintiffs' entries pertaining to

opposing Defendants' summary judgment motions lack specificity as the Court had four motions before it, but most of Plaintiffs' entries fail to indicate specifically which motion Plaintiffs were addressing.<sup>9</sup> The Court, therefore, is unable to perform an adequate analysis as to whether these billing entries are reasonable.

The Court, accordingly, denies Plaintiffs attorneys' fees for the following entries:

Row #	Date	Staff	Service Performed	Time	Cost	Fee/Expense	%	Amount Attributable to ZGA
352	3/5/2014	WPR	Begin to prepare the summary judgment motion; begin to review the discovery from all parties for the motion; e-mail form Sayles and e-mail to Tabakin.	2	\$600.00	Fee	33.33%	\$200.00
355	3/6/2014	WPR	Continue to prepare summary judgment motion.	3	\$900.00	Fee	33.33%	\$300.00
356	3/7/2014	WPR	Continue to review the file and prepare for the summary judgment motion.	3.5	\$1,050.00	Fee	33.33%	\$350.00
357	3/10/2014	WPR	Continue to review discovery and to prepare the summary judgment motion.	3	\$900.00	Fee	33.33%	\$300.00
363	3/12/2014	WPR	Continue to prepare the summary judgment motion.	6.5	\$1,950.00	Fee	33.33%	\$650.00
364	3/13/2014	WPR	Continue to prepare the summary judgment motion.	10.5	\$3,150.00	Fee	33.33%	\$1,050.00
365	3/14/2014	WPR	Continue to prepare the summary judgment motion; finalize the motion and file.	10.4	\$3,120.00	Fee	33.33%	\$1,040.00
376	3/21/2014	WPR	Telephone call with the client; review the summary judgment motions and begin to put down an outline of a response.	2.5	\$750.00	Fee	33.33%	\$250.00
377	3/21/2014	WPR	Review the Motion to Extend Time and begin to prepare a response.	0.8	\$240.00	Fee	33.33%	\$80.00
387	3/26/2014	WPR	Continue to pull cases for the opposition to the summary judgment motions of Defendants.	3	\$900.00	Fee	33.33%	\$300.00
399	4/7/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	2.5	\$750.00	Fee	33.33%	\$250.00
403	4/9/2014	WPR	Continue to prepare opposition to the Motions for Summary Judgment.	2.2	\$660.00	Fee	33.33%	\$220.00
410	4/27/2014	WPR	Continue to pull research on the opposition to the summary judgment motions filed by Zucker and EMC/Residential.	2.5	\$750.00	Fee	50.00%	\$375.00

<sup>9</sup> Plaintiffs include a billing entry for February 21, 2018, stating "Review all summary judgment filings and all responses . . ." (Pls.' Spreadsheet 29.) Because Plaintiffs explicitly indicated that the work performed related to "all" Defendants, the Court awards Plaintiffs twenty-five percent of that billing entry, totaling \$487.50. The Court similarly permits Plaintiffs to recover 25% of the billing entries for rows 657 and 661. (*See* Court's Spreadsheet.)

416	5/1/2014	WPR	Continue to prepare the opposition to the Summary Judgment Motions.	4.8	\$1,440.00	Fee	33.33%	\$480.00
418	5/2/2014	WPR	E-mails and telephone calls with all counsel and with the court regarding the return dates of the summary judgment motions.	0.6	\$180.00	Fee	33.33%	\$60.00
426	5/13/2014	WPR	Organize the summary judgment motions.	0.3	\$90.00	Fee	33.33%	\$30.00
429	5/13/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment; telephone calls and e-mails with the client regarding the payment history.	3	\$900.00	Fee	33.33%	\$300.00
436	5/16/2014	WPR	Continue to prepare opposition to the summary judgment motions; pull research on the burden of proof for payment history under RESPA and the FDCPA.	2.5	\$750.00	Fee	33.33%	\$250.00
440	5/22/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	3.5	\$1,050.00	Fee	33.33%	\$350.00
441	5/27/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	4.2	\$1,260.00	Fee	33.33%	\$420.00
443	5/28/2014	WPR	Continue to prepare the opposition to the motions for summary judgment.	2.6	\$780.00	Fee	33.33%	\$260.00
449	6/2/2014	WPR	Continue to prepare the oppositions to the summary judgment motions.	2.5	\$750.00	Fee	33.33%	\$250.00
451	6/5/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	2.8	\$840.00	Fee	33.33%	\$280.00
452	6/9/2014	WPR	Continue to draft the opposition to the summary judgment motions.	2.4	\$720.00	Fee	33.33%	\$240.00
456	6/10/2014	WPR	Continue to prepare the opposition to the summary judgment motion.	2.5	\$750.00	Fee	33.33%	\$250.00
460	6/15/2014	WPR	Continue to research and draft responses to summary judgment motions.	5.5	\$1,650.00	Fee	33.33%	\$550.00
462	6/17/2014	WPR	Read all oppositions to Plaintiff's Motion for Summary Judgment and begin to prepare outline for the reply.	3.2	\$960.00	Fee	33.33%	\$320.00
464	6/19/2014	WPR	Continue to research the issues raised in all three responses to Plaintiff's Motion for Summary Judgment; begin to prepare the reply.	2.8	\$840.00	Fee	33.33%	\$280.00
465	6/20/2014	WPR	Continue to draft the reply memorandum of law.	3.4	\$1,020.00	Fee	33.33%	\$340.00
466	6/21/2014	WPR	Continue to prepare the reply memorandum of law.	5.5	\$1,650.00	Fee	33.33%	\$550.00
467	6/22/2014	WPR	Continue to prepare the reply memorandum of law and pull research on the obligations of the Plaintiff to amend pleadings and to amend answers to discovery; draft reply and send the same for review.	6	\$1,800.00	Fee	33.33%	\$600.00
468	6/23/2014	WPR	Finalize the Reply Memorandum of Law and the Certification and Exhibits; file the same.	2.8	\$840.00	Fee	33.33%	\$280.00
501	10/7/2014	SMZ	Review of complaint and summary judgment motion reparation for settlement discussions.	0.5	\$150.00	Fee	33.33%	\$50.00

566	5/7/2015	WPR	Review the court order requesting oral argument. Pull motions and all replies to the Motion and pull the summary judgment motions and begin to review.	0.9	\$270.00	Fee	33.33%	\$90.00
569	5/14/2015	WPR	Continue to prepare for the oral arguments on the Motion to Reopen and Motions to Enforce Settlement. Review the summary judgment motions.	2.1	\$630.00	Fee	33.33%	\$210.00
573	5/19/2015	WPR	Final prep for the hearing. Review the pending motions and the motions for summary judgment.	1.4	\$420.00	Fee	33.33%	\$140.00
647	9/6/2017	WPR	Review the Henson v. Santander decision.	1.1	\$275.00	Fee	33.33%	\$91.67
654	2/19/2018	WPR	Pull summary judgment motions and review documents.	2	\$700.00	Fee	33.33%	\$233.33
656	2/19/2018	WPR	Pull summary judgment motions and review documents.	2	\$500.00	Fee	33.33%	\$166.67
658	2/21/2018	WPR	Review all summary judgment filings and all responses. Prepare outline for argument. Review the Henson and Beard decisions and pull the legislative history of the FDCPA. Review case law and statutes cited in the extensive briefs.	7.8	\$1,950.00	Fee	33.33%	\$650.00
660	2/22/2018	WPR	Final prep for oral argument on pending summary judgment motions.	2	\$500.00	Fee	33.33%	\$166.67

#### **D. Summary of the Struck Entries and the Final Lodestar Calculation**

In total, the Court struck 136 fee entries from Plaintiffs' Spreadsheet. The remaining fee entries, adjusted to the 25% split where appropriate, total \$59,396.88. (*See* Court's Spreadsheet, Row 772.) The Court, accordingly, awards Plaintiffs \$59,396.88 in attorneys' fees.

#### **E. One-Third Enhancement**

Finally, the Court denies Plaintiffs' request for a one-third fee enhancement. "[T]here is a 'strong presumption' that the lodestar figure is reasonable . . . ." *Perdue*, 559 U.S. at 554. Plaintiffs have the burden of proving an enhancement is necessary. *Id.* at 553. Plaintiffs must show "extraordinary circumstances" were present in order to overcome the presumption of reasonableness. *Id.* at 546.

Here, the Court finds Plaintiffs have failed to establish that extraordinary circumstances were present. Namely, the Court finds unpersuasive Plaintiffs' assertion that because they chose to bill their clients at a rate less than the market value, that ZGA should be accountable for a fee



enhancement. Further, ZGA is legally entitled to pursue bankruptcy, and Plaintiffs failed to demonstrate that ZGA's pursuit of that relief was dilatory or in bad faith. The Court, accordingly, denies Plaintiffs' request for a one-third fee enhancement.

**F. Expenses and Offer of Judgment**

ZGA does not dispute Plaintiffs' request for \$2,000.00, in accordance with the Offer of Judgment. (*See generally* ZGA Opp'n Br.) Additionally, the Court finds Plaintiffs' request for expenses reasonable, with the exception of expenses struck in the tables above and subject to the aforementioned 33.33% to 25% reduction. The Court, accordingly, awards Plaintiffs \$2,000.00 pursuant to the Offer of Judgment, and \$2,283.37 in expenses.

**G. The Court Denies Plaintiffs' Motion to Enforce Settlement Without Prejudice**

On December 28, 2018, Plaintiffs filed a Motion to Enforce Settlement, seeking an Order enforcing settlement terms against EMC and Residential. (*See generally* Pls.' Mot. to Enforce Br., ECF No. 195-1.) On January 8, 2019, Marix filed a Cross-Motion to Enforce Settlement against Plaintiffs. (ECF No. 196.) On the same day, counsel for EMC and Residential e-filed letter correspondence with the Court requesting a two-week adjournment of the return date for Plaintiffs' Motion, which was granted by Judge Arpert. (ECF Nos. 197, 198.) On January 29, 2019, counsel for EMC and Residential requested a further two-week adjournment, which was granted by the Court. (ECF Nos. 200, 201.)

On February 13, 2019, counsel for EMC and Residential requested a further adjournment of Plaintiffs' Motion to Enforce Settlement. (EMC Feb. 13, 2019 Correspondence, ECF No. 207.)

In their correspondence, counsel for EMC and Residential wrote, in relevant part,

[Plaintiffs' Motion to Enforce Settlement and Marix's Cross-Motion] have been adjourned previously due to the fact that Plaintiffs were considering a settlement proposal from Rushmore, the current servicer of their EMC Mortgage. Since Plaintiffs have



still not responded to Rushmore's proposal, [counsel for EMC and Residential] requested a further adjournment of the Motion to Enforce Settlement from Plaintiffs' counsel which was refused by an email which advised of Marix's [b]ankruptcy filing. If the Court has determined the automatic stay does not apply, [counsel for EMC and Residential] is requesting an additional two (2) weeks to file opposition to [Plaintiffs' Motion to Enforce Settlement].

(*Id.*) On February 17, 2019, the Court issued an Order, stating that “[t]he Court is in receipt of Defendant EMC Mortgage Corporation’s correspondence notifying the Court of its February 19, 2019 deadline to file opposition to Plaintiffs’ Motion to Enforce Settlement. (ECF No. 207.) If required, the Court will reset the briefing schedule after it considers the pending request for a stay.” (ECF No. 208.) On February 22, 2019, the Court administratively terminated this matter pending the resolution of the Bankruptcy Proceeding and Ordered that “[c]ounsel shall e-file correspondence within five days of resolution of the bankruptcy proceedings.” (ECF No. 212.) On July 11, 2019 Plaintiffs sought to re-open this matter, prior to the resolution of the Bankruptcy Proceeding. (ECF No. 213.) On February 28, 2020, the Court granted Plaintiffs’ request and also Ordered Plaintiffs to show cause by March 13, 2020 as to why the Court should not grant Marix’s request to be terminated from the case. (ECF No. 218.) The Court further stated that “[u]pon receipt of Plaintiffs’ brief, the Court shall set a briefing schedule for the reinstated motions.” (*Id.*) Plaintiffs’ never responded to or acknowledged the Court’s Order. Indeed, Plaintiffs have made no filings since July 11, 2019. It is unclear to the Court, therefore, whether a live controversy still exists such that Plaintiffs’ Motion to Enforce Settlement is ripe for determination. For those reasons, the Court denies Plaintiffs’ Motion to Enforce Settlement without prejudice. Should Plaintiffs still seek relief, they may file or re-file an appropriate motion.

**V. CONCLUSION**

For the reasons set forth above, and for other good cause shown, Plaintiffs' Motion for Attorneys' Fees is granted, as modified. The Court awards Plaintiffs \$59,396.88 in attorneys' fees, \$2,283.37 in expenses, and \$2,000.00 pursuant to the Offer of Judgment, for a total award of \$63,680.25. Plaintiffs' Motion to Enforce Settlement is denied without prejudice. The Court will enter an Order consistent with this Memorandum Opinion.

s/ Michael A. Shipp  
**MICHAEL A. SHIPP**  
**UNITED STATES DISTRICT JUDGE**

Dated: September 28, 2020

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

MELISSA RHODES and WILLIAM  
RHODES,

Plaintiffs,

v.

MARIX SERVICING, LLC, *et al.*,

Defendants.

Civil Action No. 12-1636 (MAS) (DEA)

**KEY / NOTES:**

- \* Rows filled in with RED were struck by the Court for the reasons set forth in the accompanying Memorandum Opinion.
- \* Column K is a column used by the Court to convert Plaintiffs' requested 33.33% multiplier to a 25% multiplier where appropriate, for the reasons set forth in the accompanying Memorandum Opinion.
- \* Column L represents is the same values as column I, but with the adjusted multiplier accounted for
- \* Columns J, M, and N are left intentionally blank.
- \* Column O represents the same values as Column L, but with certain entries struck, for the reasons set forth in the accompanying Memorandum Opinion.
- \* The sum of Column O represents the Court's final computation of attorneys' fees and expenses (*See* Row 772).

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)
Row #	Date	Staff	Service Performed	Time	Cost	Fee/ Expense	%	Amount Attributable to ZGA		Multiplier changed from 33.33% to 25%	Amount Attributable w/ adjusted %			Amount Attributable w/ STRUCK rows
1	1/18/2011	WPR	Draft letter to mortgage company.	0.5	\$150.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
2	2/23/2011	WPR	Prepare qualified written request for information and serve same on Marix; telephone conference with client re same.	0.5	\$150.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
3	3/31/2011	WPR	Telephone conference with client and draft the third letter to Marix regarding the bankruptcy and the qualified written request for information.	1	\$300.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
4	5/6/2011	WPR	Telephone call with the client.	0.4	\$120.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
5	5/16/2011	WPR	Review correspondence from Marix again to the client.	0.4	\$120.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
6	5/27/2011	WPR	Review the latest letter from Marix Servicing and telephone call with client; go over options with client.	1.2	\$360.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
7	6/6/2011	WPR	Telephone call with the client.	0.2	\$60.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
8	6/10/2011	WPR	Research the potential claims against Marix including the supplemental jurisdiction of the court to hear the RESPA violations.	2.5	\$750.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
9	6/10/2011	WPR	Meet with the client to discuss strategy and courses of action.	1	\$300.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -
10	7/19/2011	WPR	Telephone call with the client.	0.2	\$60.00	Fee	0.00%	\$0.00		0%	\$ -			\$ -

11	11/16/2011	WPR	Review the information from the client.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
12	11/18/2011	WPR	Telephone message to the client.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
13	12/12/2011	WPR	Telephone call with the client.	0.5	\$150.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
14	12/13/2011	WPR	E-mails to and from the client.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
15	12/13/2011	WPR	Review all of the letters and other statements from Marix; review the letters to Marix and the requirements for a qualified written request.	2	\$600.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
16	12/19/2011	WPR	Telephone message to Marix; review file of client.	0.6	\$180.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
17	12/20/2011	WPR	Telephone message for Marix Servicing.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
18	1/19/2012	WPR	Leave message for the client.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
19	1/20/2012	SMZ	Conference with Will Rubley re discussion on bankruptcy proceeding and issues with stay relief and proof of claim throughout the case.	0.8	\$240.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
20	1/20/2012	WPR	Telephone call with the client; pull research on claims against the creditor for violating the discharge order and violating RESPA; pull cases and statutes for the complaint against Marix and the motion for sanctions for violating the discharge order; telephone call and e-mail with the mortgage broker.	2.2	\$660.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
21	1/26/2012	WPR	Begin to prepare the complaint.	1.9	\$570.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
22	2/3/2012	WPR	Prepare the complaint against Marix.	3	\$900.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
23	2/9/2012	WPR	Prepare e-mail to the client.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
24	2/13/2012	WPR	E-mail with the clients.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
25	2/22/2012	WPR	E-mail to and from the client and telephone	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
26	2/23/2012	WPR	Telephone call with the client and telephone call with the representative from Wells Fargo regarding refinancing the client's home mortgage.	0.5	\$150.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
27	2/23/2012	WPR	Continue to prepare the complaint.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
28	2/28/2012	WPR	Telephone call and e-mail with lender.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
29	2/29/2012	WPR	Telephone call with lender and review the client's credit report.	1	\$300.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
30	3/5/2012	WPR	Continue to prepare the complaint and pull statutes on the FDCPA, FCRA, Declaratory Judgment Act, jurisdiction, venue and the bankruptcy code and jurisdiction in district court; telephone call with the client and review the client	6	\$1,800.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
31	3/15/2012	MPM	Review draft Complaint.	0.6	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
32	3/15/2012	MPM	Consult with Will Rubley re corrections for Complaint.	0.3	\$45.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
33	3/15/2012	WPR	Finalize the complaint and prepare the complaint, cover page and summons for filing; file everything and send the filed copies to the process server for service.	2.5	\$750.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
34	3/23/2012	WPR	Review the new documents from the client regarding the new servicer and the old attorneys for the lender; prepare and file the First Amended Complaint naming new parties.	3.8	\$1,140.00	Fee	100.00%	\$1,140.00	100%	\$	1,140.00	\$	1,140.00

35	3/27/2012	WPR	Review the new complaint and telephone call with the court regarding the summons; review letter to the court and file.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
36	3/28/2012	WPR	Prepare the summons for the First Amended Complaint and prepare all documents for service; send documents out for service.	1	\$300.00	Fee	100.00%	\$300.00	100%	\$	300.00	\$	300.00
37	4/3/2012	WPR	Telephone call with counsel for Zucker and e-mail to the client.	0.3	\$90.00	Fee	100.00%	\$90.00	100%	\$	90.00	\$	90.00
38	4/9/2012	WPR	E-mails with the client about payment history.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
39	4/17/2012	WPR	Telephone message with client and telephone call with client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
40	4/25/2012	WPR	Review the status of the case and begin to prepare the default package for Marix.	2	\$600.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
41	6/14/2012	WPR	Prepare the default package for EMC and for Marix.	2.2	\$660.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
42	6/20/2012	WPR	Telephone call with counsel for E-mails; review form of consent order; telephone call and e-mail with counsel for Zucker; pull research on claims against Zucker and declaratory judgment claims against lender and second	2.5	\$750.00	Fee	100.00%	\$750.00	100%	\$	750.00	\$	750.00
43	7/9/2012	WPR	Review answer filed by EMC Mortgage.	1	\$300.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
44	7/11/2012	WPR	Prepare the Default judgments against Mariz and default Zucker Goldberg.	2.5	\$750.00	Fee	50.00%	\$375.00	50%	\$	375.00		
45	7/17/2012	WPR	Telephone call with counsel for Marix.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
46	7/23/2012	WPR	Sign stipulation for Marix; telephone message from Brian Nichols; e-mail to Kelner; telephone call with Kelner.	0.7	\$210.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
47	8/8/2012	WPR	Review the answer filed by Marix.	1	\$300.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
48	8/15/2012	WPR	Telephone call with counsel for Zucker.	0.3	\$90.00	Fee	100.00%	\$90.00	100%	\$	90.00	\$	90.00
49	8/16/2012	WPR	Review stipulation and sign and send to counsel for Zucker.	0.2	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
50	8/21/2012	WPR	Review form of joint order; telephone call with Kelner.	0.6	\$180.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
51	8/22/2012	WPR	Draft the proposed joint discovery order; review all pleadings and send the plan to all parties; accept changes from Kelner and send amended to all remaining parties.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00	\$	135.00
52	8/23/2012	WPR	Telephone call with the client; review the order from Bertone and make changes; e-mails with all parties.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00	\$	60.00
53	8/29/2012	WPR	Telephone call with counsel for Zucker.	0.3	\$90.00	Fee	100.00%	\$90.00	100%	\$	90.00	\$	90.00
54	8/30/2012	WPR	Telephone call with chambers and e-mails to all parties; e-mail to the client.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
55	9/4/2012	WPR	E-mail to and from the client; telephone call with the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
56	9/5/2012	WPR	Meeting with the client; review new documents from the client; e-mail with counsel for Zucker; begin to prepare the second amended complaint.	2	\$600.00	Fee	33.33%	\$200.00	25%	\$	150.00	\$	150.00

57	9/6/2012	WPR	Begin to prepare the Motion to Amend and begin to prepare the second amended complaint.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
58	9/7/2012	WPR	E-mails with the client and send offer to settle to Zucker.	0.5	\$150.00	Fee	100.00%	\$150.00	100%	\$	150.00		
59	9/10/2012	WPR	E-mails with counsel in New York; review all documents for the pre-trial conference in the morning.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00		
60	9/11/2012	WPR	Travel to and attend the initial pre-trial conference with Judge Arpert in Trenton.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50	\$	262.50
61	9/13/2012	WPR	Review e-mails from counsel for Zucker; send response.	0.4	\$120.00	Fee	100.00%	\$120.00	100%	\$	120.00	\$	120.00
62	9/21/2012	WPR	Continue to prepare the second amended complaint; file the affidavits of service.	1.2	\$360.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
63	9/24/2012	WPR	Finalize the Second Amended Complaint; file the same; file the executed return of service on the First Amended Complaint; e-mail with counsel in New York.	2.5	\$750.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
64	9/25/2012	WPR	Review the final package that is being sent regular mail to all Defendants; e-mail to the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
65	9/26/2012	WPR	Prepare e-mail to the client; e-mail to and from counsel for Zucker.	0.2	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
66	10/1/2012	WPR	Continue to pull documents and review documents from the client for the initial disclosures; start preparing the initial disclosures; e-mail with the client.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50	\$	187.50
67	10/3/2012	WPR	Continue to review the documents from the client for the initial disclosures; e-mail with the client.	2.8	\$840.00	Fee	33.33%	\$280.00	25%	\$	210.00	\$	210.00
68	10/5/2012	WPR	Begin to prepare discovery demands.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
69	10/8/2012	WPR	Continue to prepare the discovery demands; telephone call with counsel for Residential Credit.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
70	10/10/2012	WPR	Prepare e-mail to the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
71	10/15/2012	WPR	E-mails to and from the client; review the new documents from the client; begin to pull documents for the medical records of the client.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
72	10/16/2012	WPR	Review e-mails.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
73	10/17/2012	WPR	Continue to draft discovery and initial disclosures; e-mail to all counsel regarding the conference call with the court.	2.2	\$660.00	Fee	33.33%	\$220.00	25%	\$	165.00	\$	165.00
74	10/18/2012	WPR	Telephone call with counsel for EMC; review pleadings to see where EMC was listed as the lender.	0.8	\$240.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
75	10/18/2012	WPR	Review the answer filed by Residential Credit.	0.7	\$210.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
76	10/18/2012	WPR	Conference call with the Judge; review e-mail from NY class action counsel.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
77	10/19/2012	WPR	Telephone call with counsel for Marix.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-

78	10/26/2012	WPR	Review the answer filed by Zucker Goldberg and begin to prepare the answer to the counterclaim; pull research on bad faith claims under FDCPA.	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00	\$	450.00
79	10/31/2012	WPR	Review all of the documents from the client and prepare the initial disclosures.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00	\$	225.00
80	11/2/2012	WPR	Review initial disclosures from Marix.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
81	11/5/2012	WPR	Finalize the initial disclosures and serve the	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
82	11/6/2012	WPR	Send initial disclosures to all parties.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
83	11/7/2012	WPR	Review the initial disclosures from all parties.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
84	11/9/2012	WPR	Begin to prepare the answer to the	0.5	\$150.00	Fee	100.00%	\$150.00	100%	\$	150.00	\$	150.00
85	11/13/2012	WPR	Finalize and file the answer to the counterclaim; serve the same on all parties; send letter to Judge Arpert.	1	\$300.00	Fee	100.00%	\$300.00	100%	\$	300.00	\$	300.00
86	11/13/2012	WPR	Meet with Scott Zaubert regarding pending matter.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00	\$	60.00
87	11/13/2012	WPR	Continue to prepare the discovery demands.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50	\$	187.50
88	11/15/2012	WPR	Continue to prepare discovery demands.	2	\$600.00	Fee	33.33%	\$200.00	25%	\$	150.00	\$	150.00
89	11/21/2012	WPR	Initial review of the discovery demands of Marix and EMC.	2	\$600.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
90	11/26/2012	WPR	E-mails with all clients.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
91	12/27/2012	WPR	Continue to prepare discovery demands and responses.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00	\$	135.00
92	1/9/2013	WPR	Conference call with the court; telephone call with the client; send discovery demands to the client.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
93	1/11/2013	WPR	Review the discovery demands of Residential.	1.8	\$540.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
94	1/14/2013	WPR	E-mails with the client; review discovery demands and proposed responses.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
95	1/16/2013	WPR	Finalize discovery demands and serve the same on all parties; continue to prepare the responses to discovery; telephone call with the client.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50	\$	262.50
96	1/17/2013	WPR	Continue to prepare the responses to discovery; e-mails with witnesses; telephone call with the client.	2.6	\$780.00	Fee	33.33%	\$260.00	25%	\$	195.00	\$	195.00
97	1/24/2013	WPR	Telephone call with Judge Rosen's office.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
98	1/28/2013	WPR	Multiple e-mails with the client and continue to prepare responses to discovery.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00	\$	90.00
99	1/29/2013	WPR	Continue to prepare responses to all discovery demands; continue to review documents from clients.	4.5	\$1,350.00	Fee	33.33%	\$450.00	25%	\$	337.50	\$	337.50
100	1/30/2013	WPR	Finalize the responses to discovery demands of all Defendants and review the documents from client; send the same to all Defendants; e-mail with all counsel.	4.5	\$1,350.00	Fee	33.33%	\$450.00	25%	\$	337.50	\$	337.50
101	1/30/2013	WPR	Review medical records and send requests for more records and narratives to treating physicians.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
102	2/1/2013	WPR	Telephone call with the client; telephone conference call with the court; telephone call with Judge Rosen's office; e-mail to all parties; e-mail the Second Amended Complaint	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00



103	2/4/2013	WPR	E-mail with all counsel and with Judge Rosen's office; phone message to Shavel.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
104	2/5/2013	WPR	E-mail message to Shavel; multiple e-mail messages to Judge Rosen's office.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
105	2/8/2013	WPR	Review the title work on the property; e-mail the same to all counsel and supplement discovery responses to include title work.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
106	2/13/2013	WPR	Telephone call with attorney for EMC	0.5	\$150.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
107	2/14/2013	WPR	E-mails with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
108	2/15/2013	WPR	E-mail with the client; telephone message for medical providers on the requests for information.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
109	2/18/2013	WPR	E-mail with all counsel.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
110	2/22/2013	WPR	Review e-mail from counsel for RCS; e-mail to all counsel.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
111	2/26/2013	WPR	Telephone call with counsel for RCS; telephone message for counsel for EMC.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
112	3/1/2013	WPR	Telephone call and e-mail to counsel for EMC.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
113	3/5/2013	WPR	E-mails with client.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
114	3/12/2013	WPR	Prepare e-mail to all counsel.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
115	3/19/2013	WPR	E-mails with Sayles and with bookkeeper.	0.2	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
116	3/20/2013	WPR	Send letter to Rosen with check.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
117	3/21/2013	WPR	Telephone call with the adversary.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
118	3/22/2013	WPR	Telephone call with counsel for EMC.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
119	3/25/2013	WPR	Telephone call with the court; letter to the court regarding conference call; e-mails with all counsel regarding the conference call.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
120	3/28/2013	WPR	Conference call with the Judge.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
121	3/28/2013	WPR	Initial review of documents from Zucker.	1	\$300.00	Fee	100.00%	\$300.00	100%	\$	300.00	\$	300.00
122	4/1/2013	WPR	Review the document production by ZGA; review the demands; begin demand letter for the missing documents.	1	\$300.00	Fee	100.00%	\$300.00	100%	\$	300.00	\$	300.00
123	4/2/2013	WPR	E-mails to and from the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
124	4/11/2013	WPR	Telephone call with counsel for EMC	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
125	4/12/2013	WPR	Initial review of the document production from Marix.	2	\$600.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
126	4/12/2013	WPR	Draft letter to Judge Arpert; fax the same to the court.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
127	4/12/2013	WPR	Review e-mail from counsel for Zucker; initial review of the answers to interrogatories.	0.5	\$150.00	Fee	100.00%	\$150.00	100%	\$	150.00	\$	150.00
128	4/15/2013	WPR	Review ZGA's responses to interrogatories; send e-mail to Sayles re interrogatories.	0.4	\$120.00	Fee	100.00%	\$120.00	100%	\$	120.00	\$	120.00
129	4/15/2013	WPR	Continue to review the documents from ZGA and Marix and review the responses to document requests and interrogatories; review e-mail from the court.	2.8	\$840.00	Fee	50.00%	\$420.00	50%	\$	420.00	\$	420.00
130	4/16/2013	WPR	Telephone call with the Judge's chambers.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
131	4/16/2013	WPR	Review e-mail from counsel for EMC.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-



132	4/16/2013	WPR	Continue to review documents from ZGA and from Marix; pull initial research on what constitutes attorney client privilege.	2	\$600.00	Fee	50.00%	\$300.00	50%	\$	300.00	\$	300.00
133	4/17/2013	JPL	Conference with Will Rubley re document production and attorney client privilege issue.	0.2	\$60.00	Fee	50.00%	\$30.00	50%	\$	30.00	\$	30.00
134	4/17/2013	WPR	Prepare e-mail to chambers; review e-mails from defense counsel to chambers; e-mail to and from the client.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
135	4/17/2013	WPR	Telephone call with counsel for Marix; continue to review documents from Marix, including the Loan Notes and logs.	2	\$600.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
136	4/17/2013	WPR	Review letter from counsel for ZGA on the discovery responses; begin to prepare the Motion to Compel ZGA.	1.8	\$540.00	Fee	100.00%	\$540.00	100%	\$	540.00	\$	540.00
137	4/18/2013	WPR	Prepare e-mail to counsel for ZGA; pull First and Second Amended Complaints; review bankruptcy docket and pleadings; prepare e-mail to the client; review e-mail from the court scheduling conference call; prepare e-mail to all counsel about conference call; e-mails back and forth with counsel for ZGA	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
138	4/18/2013	WPR	Pull research on waiver of the attorney client privilege when a party sues his former client.	1.2	\$360.00	Fee	50.00%	\$180.00	50%	\$	180.00	\$	180.00
139	4/18/2013	WPR	Begin review of answers to discovery from Residential.	1	\$300.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
140	4/19/2013	WPR	Review all the discovery responses from all parties and prepare letter to counsel for ZGA about the deficiencies in their responses.	1.4	\$420.00	Fee	100.00%	\$420.00	100%	\$	420.00	\$	420.00
141	4/19/2013	WPR	Telephone conference call with the Judge.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
142	4/19/2013	WPR	Telephone call with the client.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50	\$	52.50
143	4/19/2013	WPR	Telephone call with counsel for Marix; telephone message for counsel for Residential.	0.8	\$240.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
144	4/24/2013	WPR	Begin to prepare the mediation statement.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
145	4/24/2013	WPR	Begin review of medical records.	1.3	\$390.00	Fee	33.33%	\$130.00	25%	\$	97.50	\$	97.50
146	4/24/2013	WPR	Telephone call with counsel for EMC and	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
147	4/25/2013	WPR	Telephone call with counsel for Marix; telephone message for counsel for EMC and Residential; telephone call with client.	0.6	\$180.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
148	4/26/2013	WPR	Begin to review the medical records of the	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
149	4/29/2013	WPR	Continue to review the medical records; e-mail with all counsel; e-mail to and from client.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50	\$	52.50
150	4/30/2013	WPR	Review the medical records from primary care physician and the rest of the documents from AtlantiCare; prepare the documents for service on Defendants; e-mail all Defendants.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
151	4/30/2013	WPR	Prepare response to ZGA's demand for additional	1	\$300.00	Fee	100.00%	\$300.00	100%	\$	300.00	\$	300.00
152	5/1/2013	WPR	Continue to prepare the mediation statement; e-mails with Judge Rosen's office; send e-mail to client.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		

153	5/2/2013	WPR	Finalize the mediation statement and send the same with all exhibits to Judge Rosen; review the credit report of the client; send credit report to all parties; prepare e-mail to counsel for EMC regarding outstanding discovery; e-mail to	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50		
154	5/3/2013	SMZ	Conference with Will Rubley re discussion regarding strategy, mediation, trial counsel and class action status.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00		
155	5/3/2013	SMZ	Discussion with Will Rubley and Eric Browndorf of Cooper Levenson re co-counsel to case.	1	\$300.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
156	5/3/2013	WPR	Telephone call with outside counsel; e-mails to outside counsel.	0.7	\$210.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
157	5/6/2013	SMZ	Discussion with Eric Browndorf and client re trial counsel and possible class action.	0.8	\$240.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
158	5/6/2013	SMZ	Discussion with Will Rubley on file and preparation for mediation.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50		
159	5/6/2013	WPR	Telephone call with the client; prepare e-mail to Eric Browndorf.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
160	5/7/2013	SMZ	Discussion with Eric Browndorf re basic strategy for mediation.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
161	5/7/2013	SMZ	Mediation preparation with Will Rubley and discussion with client.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50		
162	5/7/2013	SMZ	Telephone conference with Will Rubley re various discussions regarding proceeding forward with mediation and parties not attending.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
163	5/7/2013	WPR	Telephone call with the client to prepare for mediation.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
164	5/7/2013	WPR	Multiple telephone calls and e-mails with Judge Rosen, Judge Arpert, secretary for Judge Rosen and all parties to the case; telephone call with co-counsel Eric Browndorf.	2.2	\$660.00	Fee	33.33%	\$220.00	25%	\$	165.00		
165	5/7/2013	WPR	Pull documents and prepare for the mediation; review all discovery; send credit report to all parties as supplement to answers to discovery.	1.3	\$390.00	Fee	33.33%	\$130.00	25%	\$	97.50		
166	5/8/2013	SMZ	Multiple telephone conferences with Will Rubley re settlement conference discussions with client and Will at conference.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
167	5/8/2013	WPR	Travel to and attend the mediation in	6.2	\$1,860.00	Fee	33.33%	\$620.00	25%	\$	465.00		\$ 465.00
168	5/9/2013	WPR	Begin to prepare the Motions to Compel, Subpoenas and Motion to Amend.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00		\$ 135.00
169	5/10/2013	WPR	Continue to prepare the Motions to Compel.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50		\$ 112.50
170	5/13/2013	WPR	Prepare e-mail to Eric Browndorf.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00		
171	5/13/2013	WPR	Continue to prepare motions to compel; prepare certification of counsel, proposed order, and Notice for EMC motion.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		\$ 187.50

172	5/14/2013	SMZ	Conference with Will Rubley re discussion about going forward with litigation.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
173	5/14/2013	WPR	Finalize Motion to Compel for EMC and file the same.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
174	5/14/2013	WPR	Finalize and file the Motion to Compel to	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00	\$	450.00
175	5/14/2013	WPR	Telephone call with Sayles.	0.2	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
176	5/15/2013	WPR	Telephone call with Kelner.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
177	5/15/2013	WPR	E-mail with all parties.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
178	5/16/2013	WPR	Conference call with Eric Browndorf; meet with Scott Zaubers.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00		
179	5/16/2013	WPR	Conference call with the court.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00	\$	60.00
180	5/21/2013	WPR	Begin to prepare supplemental discovery demands.	1.1	\$330.00	Fee	33.33%	\$110.00	25%	\$	82.50	\$	82.50
181	5/24/2013	WPR	Continue to review and prepare new discovery demands.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
182	6/4/2013	WPR	Telephone call with co-counsel regarding outstanding discovery.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
183	6/7/2013	WPR	Review the new document production from	1.2	\$360.00	Fee	100.00%	\$360.00	100%	\$	360.00	\$	360.00
184	6/11/2013	WPR	Begin to review the documents from Zucker and the supplemental responses to interrogatories; take notes on missing information and begin to pull research on implied	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00	\$	450.00
185	6/12/2013	WPR	Review the documents from EMC and send e-mail to Tabakin.	1	\$300.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
186	6/12/2013	WPR	Telephone calls with the court; e-mails from the court regarding the pending motions; telephone call with the Judge's law clerk.	0.6	\$180.00	Fee	33.33%	\$60.00	25%	\$	45.00	\$	45.00
187	6/17/2013	WPR	Continue to review the documents from EMC, including the second package of documents received today.	2.3	\$690.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
188	6/18/2013	WPR	Continue to review discovery documents; begin to prepare second round of discovery and Motions to Amend the Complaint and to expand scope of discovery.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50	\$	187.50
189	6/19/2013	WPR	Pull research on waiver of attorney client privilege.	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00	\$	450.00
190	6/20/2013	WPR	Review documents from EMC and from	2.9	\$870.00	Fee	50.00%	\$435.00	50%	\$	435.00	\$	435.00
191	6/20/2013	WPR	Begin to prepare the reply memorandum for the Motion to Compel; pull research on the Waiver of the attorney client privilege when a defendant asserts the bona fide error defense.	2	\$600.00	Fee	50.00%	\$300.00	50%	\$	300.00	\$	300.00
192	6/24/2013	WPR	Continue to prepare and finalize the Reply Memorandum and file the same.	6.5	\$1,950.00	Fee	50.00%	\$975.00	50%	\$	975.00	\$	975.00
193	6/25/2013	WPR	Serve the Reply Memorandum on all parties.	0.5	\$150.00	Fee	50.00%	\$75.00	50%	\$	75.00	\$	75.00
194	7/15/2013	WPR	Begin to prepare new round of discovery and Motions to Extend Discovery and Amend Pleadings.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50	\$	187.50
195	7/18/2013	WPR	Continue to review documents from all Defendants and to prepare the second round of discovery.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00	\$	135.00

196	7/23/2013	WPR	Continue to review the documents and prepare supplemental requests.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
197	7/24/2013	WPR	Telephone call with the client; review documents from the client and prepare and copy documents to send to the client.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00	\$	90.00
198	7/30/2013	WPR	Telephone call with Kelner.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
199	8/1/2013	WPR	Telephone call with Judge Rosen.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
200	8/8/2013	WPR	Begin to prepare the subpoenas to the third parties; second round of discovery to all parties.	4.5	\$1,350.00	Fee	33.33%	\$450.00	25%	\$	337.50	\$	337.50
201	8/9/2013	WPR	Continue to review the documents from all parties for preparing the subpoenas to third parties.	2.2	\$660.00	Fee	33.33%	\$220.00	25%	\$	165.00	\$	165.00
202	8/19/2013	WPR	Review the opinion and order on the Motion to Compel; e- mail the same to Browndorf; telephone call with the client.	1.5	\$450.00	Fee	50.00%	\$225.00	50%	\$	225.00		
203	8/21/2013	WPR	Pull research on interlocutory appeals and the procedure; review the discovery from Marix.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00	\$	135.00
204	8/22/2013	WPR	Review the assertion of privilege from Marix; draft letter to Marix demanding full disclosure of all documents no longer subject to privilege.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
205	8/28/2013	WPR	Review the order and begin to prepare the second Motion to Compel.	1.5	\$450.00	Fee	50.00%	\$225.00	50%	\$	225.00	\$	225.00
206	8/30/2013	WPR	Draft letter to Sayles; serve it on all parties; pull research on whether second letter demanding discovery is necessary after Order to Compel is entered.	0.4	\$120.00	Fee	100.00%	\$120.00	100%	\$	120.00	\$	120.00
207	9/3/2013	WPR	E-mails to and from Sayles.	0.1	\$30.00	Fee	100.00%	\$30.00	100%	\$	30.00	\$	30.00
208	9/4/2013	WPR	Begin to prepare the Motion for fees and costs; pull research on the Lodestar Analysis.	1.7	\$510.00	Fee	50.00%	\$255.00	50%	\$	255.00	\$	255.00
209	9/5/2013	WPR	Telephone call with client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
210	9/10/2013	WPR	Telephone call with counsel for Marix.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
211	9/11/2013	WPR	Review e-mail from Sayles; prepare e-mail to the client.	0.2	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
212	9/12/2013	WPR	Review the information from Zucker after order to compel.	2	\$600.00	Fee	100.00%	\$600.00	100%	\$	600.00	\$	600.00
213	9/13/2013	WPR	Review the documents from Marix after order to compel.	2.2	\$660.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
214	9/13/2013	WPR	Pull research on claims against America's Servicing Corp.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
215	9/16/2013	WPR	Continue to review documents from Zucker and from Marix; continue to review potential claims against America's Servicing.	2.7	\$810.00	Fee	50.00%	\$405.00	50%	\$	405.00	\$	405.00
216	9/18/2013	WPR	Telephone call with Kelner.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
217	9/18/2013	WPR	Continue to review documents from Marix and from Zucker.	2.5	\$750.00	Fee	50.00%	\$375.00	50%	\$	375.00	\$	375.00
218	9/19/2013	WPR	Conference call with the court.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
219	9/19/2013	WPR	Review documents and prepare for the conference call with the court; review the documents from Marix and Zucker to identify those with information from Zucker for depositions.	2.1	\$630.00	Fee	33.33%	\$210.00	25%	\$	157.50	\$	157.50

220	9/19/2013	WPR	Telephone call with Sayles.	0.3	\$90.00	Fee	100.00%	\$90.00	100%	\$	90.00	\$	90.00
221	9/19/2013	WPR	Pull research on post-petition attorney's fees in bankruptcy and whether they need to be approved by the bankruptcy court in order to be considered due and owing.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50		
222	9/20/2013	WPR	Telephone call with the client.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
223	9/23/2013	WPR	Finalize the subpoena to LPS; search for the location of LPS; telephone call with the process server; send the subpoena and whatever information I have on LPS to the process	2	\$600.00	Fee	33.33%	\$200.00	25%	\$	150.00	\$	150.00
224	9/23/2013	WPR	E-mails with the client regarding taxes on the property.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
225	9/24/2013	SMZ	Discussion with Will Rubley over case and strategy for discovery.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
226	9/24/2013	WPR	E-mails to and from the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
227	9/25/2013	WPR	Review service of subpoena to LPS and e-mail to all counsel.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
228	9/26/2013	WPR	Review research and prepare the Motion for Attorneys Fees and Costs.	3.8	\$1,140.00	Fee	50.00%	\$570.00	50%	\$	570.00		
229	9/27/2013	SMZ	Conference with Will Rubley re discussion regarding case and conference call with Eric Browndorf.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
230	9/27/2013	WPR	File the Motion for Fees; e-mails with Sayles regarding the motions.	0.7	\$210.00	Fee	50.00%	\$105.00	50%	\$	105.00		
231	9/27/2013	WPR	Review the responses from LPS to the subpoena; begin researching service of the subpoena on LPT in Texas.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
232	9/30/2013	WPR	Telephone call with counsel for LPS; review documents from Marix to identify individuals at LPS and its subsidiaries.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
233	9/30/2013	WPR	Telephone call with counsel for LPS and review documents with counsel regarding LPS Default Solutions; search for LPS Default Solutions and claims against LPS and AI	1.9	\$570.00	Fee	33.33%	\$190.00	25%	\$	142.50		
234	9/30/2013	WPR	Pull research on post-petition attorneys fees by secured creditor and violation of discharge injunctions; continue to review the notes from Marix and the e-mails and communications from Zucker to LPS Default Solutions.	1.1	\$330.00	Fee	33.33%	\$110.00	25%	\$	82.50		
235	10/1/2013	SMZ	Meeting with Will Rubley to discuss strategy and prepare for meeting on class action.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
236	10/1/2013	WPR	Meeting with Browndorf, Thorton, and	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		
237	10/3/2013	SMZ	Review of bankruptcy pleadings for mention of fees and stay relief from Zucker Goldberg.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00	\$	90.00
238	10/4/2013	WPR	Research service of subpoenas on credit reporting agencies and on LPS Default Solutions, Inc.	2	\$600.00	Fee	33.33%	\$200.00	25%	\$	150.00	\$	150.00
239	10/4/2013	WPR	E-mail to and from counsel for Marix.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-

240	10/9/2013	WPR	Review the opposition filed by Zucker and EMC; review the docket and the case management orders; prepare reply to be filed with the court.	2.5	\$750.00	Fee	50.00%	\$375.00	50%	\$	375.00	\$	375.00
241	10/9/2013	WPR	Review the opposition to the Motion for Fees filed by EMC.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
242	10/10/2013	JPL	Revise letter brief; conference with Will	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
243	10/10/2013	WPR	Review draft of the reply memorandum to Judge Arpert; finalize the reply and file it with the court.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
244	10/11/2013	WPR	Pull research and telephone call with credit reporting agencies regarding service of the subpoena and what information I need from them.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
245	10/16/2013	WPR	Review the documents and prepare and serve subpoena on LPS Default Solutions.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
246	10/17/2013	WPR	Subpoena to Lender Processing Services; telephone call with LPS and telephone call with the client.	1.1	\$330.00	Fee	33.33%	\$110.00	25%	\$	82.50	\$	82.50
247	10/18/2013	WPR	Telephone call with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
248	10/22/2013	WPR	E-mails back and forth with the client regarding the need for the HIPAA forms and fax the same to the client; pull our claims regarding emotional distress damages.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
249	10/25/2013	WPR	Telephone call with the client.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
250	10/28/2013	WPR	E-mails to and from the client regarding the outstanding taxes.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
251	10/30/2013	WPR	E-mail with process servers.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
252	10/31/2013	WPR	Pull research on Rule 30(b)(6) notices and what needs to be included.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00	\$	135.00
253	11/4/2013	WPR	Continue to prepare the Notices of Depositions to all parties; review research on Rule 30(b)(6).	1.9	\$570.00	Fee	33.33%	\$190.00	25%	\$	142.50	\$	142.50
254	11/4/2013	WPR	Check status of service of subpoena to LPS Default Solutions.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
255	11/5/2013	WPR	Finalize the Notices of Depositions and serve the same on all parties.	1.3	\$390.00	Fee	33.33%	\$130.00	25%	\$	97.50	\$	97.50
256	11/5/2013	WPR	Telephone call with LPS Default Solutions in-house counsel regarding the responses to the subpoenas; pull research on the individual known as Al Evans at LPS Default Solutions; pull research on subpoena of a non-party employee of a non-party for a deposition here	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00		
257	11/6/2013	WPR	E-mails with all parties regarding the scheduling of depositions; e-mail with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
258	11/7/2013	WPR	E-mails to and from all parties.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
259	11/8/2013	WPR	Telephone call with Kelner; e-mail documents to Kelner; put documents on disc for Kelner.	0.5	\$150.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
260	11/11/2013	WPR	E-mails to and from all parties regarding deposition dates.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
261	11/12/2013	WPR	Telephone call with the client.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50



262	11/13/2013	WPR	Begin to prepare for the depositions of the four corporate designees.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50	\$	262.50
263	11/14/2013	WPR	Continue to prepare for the depositions of the corporate designees.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
264	11/15/2013	WPR	E-mails with all parties regarding depositions; e-mail regarding conference call with the court; e-mails with the client.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
265	11/18/2013	SMZ	Conference with Will Rubley and client re discussion of case going forward/depositions/offer.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
266	11/18/2013	WPR	E-mails to all counsel.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
267	11/18/2013	WPR	Telephone call with Kelner.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
268	11/18/2013	WPR	Conference call with the court.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50	\$	52.50
269	11/18/2013	WPR	Telephone call and e-mail with Rosen and all parties.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
270	11/19/2013	WPR	E-mails with the client and e-mail to adversary with documents proving that Plaintiffs are not in default.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
271	11/21/2013	WPR	E-mails with all parties.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
272	11/25/2013	SMZ	Conference with Will Rubley and doctor re expert report.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
273	11/25/2013	WPR	Telephone call with the client; telephone call with the medical expert; letter to the medical expert.	1.3	\$390.00	Fee	33.33%	\$130.00	25%	\$	97.50	\$	97.50
274	11/27/2013	WPR	E-mails to the client and to Tabakin regarding taxes.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
275	12/2/2013	WPR	Review the Opinion and Order on the Motion for Fees.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
276	12/3/2013	WPR	E-mails with the client regarding payment of taxes.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
277	12/5/2013	WPR	Telephone call with the expert and e-mails to and from the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
278	12/11/2013	WPR	Telephone call and e-mails to and from the	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
279	12/12/2013	WPR	E-mails to and from client and all parties.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
280	12/12/2013	WPR	Begin to prepare for the depositions of all parties; review the pleadings and the affirmative defenses of all parties.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00	\$	225.00
281	12/13/2013	WPR	E-mails with client and with all parties regarding depositions.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
282	12/16/2013	WPR	E-mails to and from all counsel and the client regarding depositions.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
283	12/17/2013	WPR	Continue to prepare for the depositions of all parties.	6.5	\$1,950.00	Fee	33.33%	\$650.00	25%	\$	487.50	\$	487.50
284	12/18/2013	WPR	Finalize preparations for the deposition of EMC/Residential.	2.2	\$660.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
285	12/18/2013	WPR	Finalize the deposition preparations for Marix and for ZGA.	6.5	\$1,950.00	Fee	50.00%	\$975.00	50%	\$	975.00	\$	975.00
286	12/19/2013	WPR	Travel to and final preparations for the depositions of Marix and ZGA.	1.1	\$330.00	Fee	50.00%	\$165.00	50%	\$	165.00	\$	165.00
287	12/19/2013	WPR	Depositions of Marix and ZGA	6.2	\$1,860.00	Fee	50.00%	\$930.00	50%	\$	930.00	\$	930.00

288	12/19/2013	WPR	E-mails and telephone calls with the client regarding payment history.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
289	12/31/2013	WPR	E-mails with all counsel; draft letter to Judge Arpert; telephone call with Arpert's chambers; review exhibits and prepare to send to all parties.	1.1	\$330.00	Fee	33.33%	\$110.00	25%	\$	82.50	\$	82.50
290	1/2/2014	WPR	Review the pleadings for the deposition notices to other witnesses; initial review of the deposition transcripts.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
291	1/3/2014	WPR	Telephone call with Judge Arpert.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
292	1/6/2014	WPR	Telephone conference call with all parties; telephone call with Kelner.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
293	1/6/2014	WPR	Telephone call with the expert.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
294	1/7/2014	WPR	Review of depositions and exhibits.	0.9	\$270.00	Fee	33.33%	\$90.00	25%	\$	67.50	\$	67.50
295	1/7/2014	WPR	E-mails with mediator and with all parties.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
296	1/8/2014	WPR	Multiple e-mails to all parties and telephone call with Tabakin regarding scheduling of depositions.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
297	1/8/2014	WPR	Draft letter to Judge Arpert; e-mail to all	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
298	1/8/2014	WPR	Telephone call with client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
299	1/8/2014	WPR	Telephone call with expert.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
300	1/9/2014	WPR	Review order from court.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
301	1/10/2014	WPR	Draft letters to Sayles and Kelner regarding document requests.	1	\$300.00	Fee	50.00%	\$150.00	50%	\$	150.00	\$	150.00
302	1/13/2014	WPR	Send out the letters to Sayles and Kelner.	0.5	\$150.00	Fee	50.00%	\$75.00	50%	\$	75.00	\$	75.00
303	1/14/2014	WPR	E-mails with the client; telephone call with the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
304	1/15/2014	WPR	E-mails with the client and telephone call with the client.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50	\$	52.50
305	1/20/2014	WPR	E-mails with Kelner.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
306	1/21/2014	WPR	Prepare for the meeting with the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
307	1/22/2014	WPR	Continue to prepare for the continued deposition of the Marix representative; review the prior deposition transcript.	1.3	\$390.00	Fee	33.33%	\$130.00	25%	\$	97.50	\$	97.50
308	1/23/2014	SMZ	Meeting with client re discussion regarding case going forward/depositions.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00	\$	90.00
309	1/23/2014	WPR	Meet with the client to prepare for depositions.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50	\$	187.50
310	1/24/2014	WPR	Final preparation for deposition of Marix.	0.9	\$270.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
311	1/24/2014	WPR	Travel to and attend deposition of Marix representative.	4.2	\$1,260.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
312	1/27/2014	WPR	Telephone call with Kelner.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
313	1/28/2014	WPR	Final preparation of client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
314	1/28/2014	WPR	Travel to and attend the depositions of	6.2	\$1,860.00	Fee	33.33%	\$620.00	25%	\$	465.00	\$	465.00
315	1/29/2014	WPR	Telephone call with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
316	1/29/2014	WPR	Telephone call with Tabakin; review letter from Tabakin to Judge.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
317	1/29/2014	WPR	Initial review of expert report.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
318	1/30/2014	WPR	In depth review of the expert report.	2	\$600.00	Fee	33.33%	\$200.00	25%	\$	150.00	\$	150.00
319	1/31/2014	SMZ	Conference with Will Rubley re detailed discussion regarding strategy and previous events from bankruptcy.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00



320	1/31/2014	WPR	Continue to review expert report; telephone call with the expert and with the client.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00	\$	90.00
321	2/10/2014	WPR	Review depositions of William and Melissa Rhodes.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00	\$	90.00
322	2/10/2014	WPR	E-mails with all parties regarding depositions.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
323	2/11/2014	WPR	E-mails with all counsel regarding remaining depositions; e-mails with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
324	2/11/2014	WPR	E-mails with all parties regarding depositions.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
325	2/12/2014	WPR	E-mails with all parties regarding taxes and e-mail regarding depositions.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
326	2/12/2014	WPR	Begin deposition preparation for other witnesses from Zucker.	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00	\$	450.00
327	2/14/2014	WPR	E-mails with all parties; final review of expert report; send the same to all parties.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
328	2/18/2014	WPR	Prepare for the depositions of Zucker and Daniels; review prior preparation for deposition of EMC/Residential.	3.5	\$1,050.00	Fee	100.00%	\$1,050.00	100%	\$	1,050.00	\$	1,050.00
329	2/19/2014	WPR	Travel to and conduct the depositions of Zucker, Daniels and representative from EMC/Residential.	9.5	\$2,850.00	Fee	50.00%	\$1,425.00	50%	\$	1,425.00	\$	1,425.00
330	2/20/2014	WPR	Pull research on facsimile of attorney signature on NOIs.	1.1	\$330.00	Fee	100.00%	\$330.00	100%	\$	330.00	\$	330.00
331	2/20/2014	WPR	Telephone call with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
332	2/20/2014	WPR	E-mail and telephone call with Kelner regarding settlement.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
333	2/21/2014	SMZ	Conference with Will Rubley re settlement discussion with client.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
334	2/21/2014	WPR	Telephone call with the client and then e-mail to all parties concerning settlement.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
335	2/21/2014	WPR	Letter to Tabakin.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
336	2/21/2014	WPR	Check status of document requests to Zucker and e-mail to Sayles.	0.2	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
337	2/24/2014	WPR	Telephone call with Kelner and e-mail to	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
338	2/24/2014	WPR	E-mails to and from client regarding IME.	0.1	\$30.00	Fee	50.00%	\$15.00	50%	\$	15.00	\$	15.00
339	2/24/2014	WPR	E-mails with the client and telephone call with the client regarding the IME.	0.1	\$30.00	Fee	50.00%	\$15.00	50%	\$	15.00	\$	15.00
340	2/24/2014	WPR	Telephone calls with Kelner.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
341	2/26/2014	WPR	Telephone call with Kelner.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
342	2/26/2014	WPR	Telephone message for the client.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
343	2/27/2014	WPR	Telephone call with the client.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
344	2/28/2014	WPR	Review e-mail from the client.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
345	2/28/2014	WPR	Telephone call with Kelner and with Zauber.	0.7	\$210.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
346	3/2/2014	WPR	Telephone call with Zauber regarding possible settlement.	0.6	\$180.00	Fee	33.33%	\$60.00	25%	\$	45.00		
347	3/3/2014	SMZ	Telephone conference with Will Rubley re settlement discussion.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
348	3/3/2014	WPR	Prepare e-mail to Kelner re settlement.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-

349	3/3/2014	WPR	Telephone call with Kelner.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
350	3/4/2014	WPR	Prepare e-mail to Tabakin and Sayles requesting documents.	0.1	\$30.00	Fee	50.00%	\$15.00	50%	\$	15.00	\$	15.00
351	3/4/2014	WPR	E-mails and telephone calls with Kelner.	0.5	\$150.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
352	3/5/2014	WPR	Begin to prepare the summary judgment motion; begin to review the discovery from all parties for the motion; e-mail form Sayles and e-mail to Tabakin.	2	\$600.00	Fee	33.33%	\$200.00	25%	\$	150.00		
353	3/6/2014	WPR	Review information from Sayles.	1.1	\$330.00	Fee	100.00%	\$330.00	100%	\$	330.00	\$	330.00
354	3/6/2014	WPR	Review e-mail from Tabakin.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
355	3/6/2014	WPR	Continue to prepare summary judgment	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		
356	3/7/2014	WPR	Continue to review the file and prepare for the summary judgment motion.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50		
357	3/10/2014	WPR	Continue to review discovery and to prepare the summary judgment motion.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		
358	3/10/2014	WPR	Telephone call with Kelner.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
359	3/11/2014	WPR	Pull research on the vicarious liability of EMC for the conduct of Zucker, Marix and Residential.	6.2	\$1,860.00	Fee	33.33%	\$620.00	25%	\$	465.00	\$	465.00
360	3/11/2014	WPR	Telephone call and e-mails with Marix regarding settlement.	0.6	\$180.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
361	3/11/2014	WPR	E-mails with counsel regarding the stipulation concerning the expert report and the e-mail from Tabakin regarding missing documents.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
362	3/12/2014	WPR	E-mails with counsel for Marix.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
363	3/12/2014	WPR	Continue to prepare the summary judgment motion.	6.5	\$1,950.00	Fee	33.33%	\$650.00	25%	\$	487.50		
364	3/13/2014	WPR	Continue to prepare the summary judgment motion.	10.5	\$3,150.00	Fee	33.33%	\$1,050.00	25%	\$	787.50		
365	3/14/2014	WPR	Continue to prepare the summary judgment motion; finalize the motion and file.	10.4	\$3,120.00	Fee	33.33%	\$1,040.00	25%	\$	780.00		
366	3/14/2014	WPR	Review the motion to compel IME and extend time.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50
367	3/15/2014	WPR	Initial review of the summary judgment motion filed by Zucker.	1	\$300.00	Fee	100.00%	\$300.00	100%	\$	300.00	\$	300.00
368	3/15/2014	WPR	Initial review of the summary judgment motion filed by EMC.	0.5	\$150.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
369	3/17/2014	WPR	Prepare cover letter for motion and send courtesy copies of motion to all parties.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
370	3/17/2014	WPR	Check local rules and e-mail to all parties.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
371	3/17/2014	WPR	Review the expert report of Marix; e-mails with counsel for Marix; begin to pull case law on the Net Opinion Rule.	2.2	\$660.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
372	3/17/2014	WPR	E-mail to all counsel about extending time for responses to dispositive motions.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
373	3/17/2014	WPR	E-mails with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
374	3/19/2014	WPR	Draft letter to the clerk invoking Loc.R.Civ.P. 7.1(d)(f).	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
375	3/19/2014	WPR	Prepare e-mail to Tabakin regarding missing documents.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-

376	3/21/2014	WPR	Telephone call with the client; review the summary judgment motions and begin to put down an outline of a response.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		
377	3/21/2014	WPR	Review the Motion to Extend Time and begin to prepare a response.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00		
378	3/24/2014	WPR	Conference call with the court and all parties.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		\$ 37.50
379	3/24/2014	WPR	E-mail all parties regarding conference call; set up the conference call with the court; prepare e-mail to Judge Rosen's office and e-mail all parties regarding mediation; prepare e-mail to the client re mediation.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00		
380	3/24/2014	WPR	Review the deposition transcript of EMC in preparation for the conference call.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
381	3/24/2014	WPR	Review scheduling orders and prepare for telephone conference call.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50		\$ 22.50
382	3/25/2014	SMZ	Conference with Will Rubley re discussion regarding going forward/division of responsibilities.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		\$ 37.50
383	3/25/2014	WPR	Telephone call with Kelner.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
384	3/25/2014	WPR	E-mails with counsel for Marix.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
385	3/25/2014	WPR	E-mails to the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50		\$ 22.50
386	3/26/2014	WPR	E-mails with the client regarding the payment history and the checks, bank statements and ledgers.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00		\$ 60.00
387	3/26/2014	WPR	Continue to pull cases for the opposition to the summary judgment motions of Defendants.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		
388	3/26/2014	WPR	E-mails with the client and with Kelner regarding scheduling the IME.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
389	3/27/2014	WPR	Prepare e-mail to the client.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50		\$ 7.50
390	3/27/2014	WPR	Review the old bankruptcy file for additional payment records; go through each and every box of documents.	1.1	\$330.00	Fee	33.33%	\$110.00	25%	\$	82.50		\$ 82.50
391	3/31/2014	WPR	Pull research on Net Opinions.	1.7	\$510.00	Fee	33.33%	\$170.00	25%	\$	127.50		\$ 127.50
392	3/31/2014	WPR	Review the reply memorandum of law on the Motion to Compel.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50		\$ 52.50
393	3/31/2014	WPR	E-mails with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00		\$ 15.00
394	4/2/2014	WPR	Telephone call with Kelner.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
395	4/3/2014	WPR	E-mails from all parties.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50		\$ 7.50
396	4/4/2014	WPR	E-mail to all parties and e-mail to the court with the signed consent order.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00		\$ 30.00
397	4/4/2014	WPR	Telephone call with EMC counsel regarding the consent order; e-mails to all parties with revised consent order.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50		\$ 22.50
398	4/7/2014	WPR	Review e-mail from the court and telephone call with Kelner.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00		\$ 15.00
399	4/7/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		
400	4/8/2014	WPR	Review e-mail from Kelner and the court.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50		\$ 7.50
401	4/8/2014	WPR	E-mails with the client.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50		\$ 7.50

402	4/9/2014	WPR	Letter from Kelner and e-mail from the court.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
403	4/9/2014	WPR	Continue to prepare opposition to the Motions for Summary Judgment.	2.2	\$660.00	Fee	33.33%	\$220.00	25%	\$	165.00		
404	4/10/2014	WPR	E-mails with the court and with Kelner; call with Kelner.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
405	4/10/2014	WPR	Review the payment history from the client; e-mails to and from the client.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
406	4/15/2014	WPR	Review documents from the client and e-mails with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
407	4/16/2014	WPR	Telephone call with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
408	4/17/2014	WPR	Telephone call with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
409	4/24/2014	WPR	Continue to review the payment history and e-mails with the client.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00	\$	75.00
410	4/27/2014	WPR	Continue to pull research on the opposition to the summary judgment motions filed by Zucker and EMC/Residential.	2.5	\$750.00	Fee	50.00%	\$375.00	50%	\$	375.00		
411	4/28/2014	SMZ	Prepare for mediation.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
412	4/29/2014	WPR	[GIW] Redaction of documents.	3.5	\$315.00	Fee	33.33%	\$105.00	25%	\$	78.75	\$	78.75
413	4/29/2014	WPR	Review the new payment history and prepare documents for service on all parties; serve documents on all parties.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00	\$	90.00
414	4/30/2014	WPR	[GIW] Redaction of documents.	1.5	\$135.00	Fee	33.33%	\$45.00	25%	\$	33.75	\$	33.75
415	4/30/2014	WPR	Recreate payment history from 6 years of bank records and various documents and ledgers from the Defendants and the prior servicer; review all bank records and all payment histories; identify each payment made, with corresponding bates stamp for proof of payment; e-mails and telephone calls with the client regarding each bank statement and each	6.5	\$1,950.00	Fee	33.33%	\$650.00	25%	\$	487.50	\$	487.50
416	5/1/2014	WPR	Continue to prepare the opposition to the Summary Judgment Motions.	4.8	\$1,440.00	Fee	33.33%	\$480.00	25%	\$	360.00		
417	5/1/2014	WPR	Telephone call with the client to confirm the IME and e-mail to counsel for Marix regarding the IME.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
418	5/2/2014	WPR	E-mails and telephone calls with all counsel and with the court regarding the return dates of the summary judgment motions.	0.6	\$180.00	Fee	33.33%	\$60.00	25%	\$	45.00		
419	5/2/2014	WPR	Telephone call with Tabakin regarding the Certification from his client.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
420	5/5/2014	WPR	E-mails with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
421	5/5/2014	WPR	Telephone call with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
422	5/6/2014	WPR	Telephone call with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
423	5/8/2014	WPR	Begin to prepare the settlement memorandum.	1.5	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50		
424	5/12/2014	WPR	Finalize and file the confidential settlement memo with the court.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50		
425	5/13/2014	WPR	[GIW] File organization.	1	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
426	5/13/2014	WPR	Organize the summary judgment motions.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50		
427	5/13/2014	WPR	E-mails to and from the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00

428	5/13/2014	WPR	Review the billing records in anticipation of the settlement conference.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00		
429	5/13/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment; telephone calls and e-mails with the client regarding the payment history.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		
430	5/14/2014	WPR	Continue to prepare the opposition to the motions for summary judgment by EMC and Zucker; pull cases on conflict of law between the FDIC and the NJ FFA.	2.5	\$750.00	Fee	50.00%	\$375.00	50%	\$	375.00		\$ 375.00
431	5/15/2014	SMZ	Travel to and appearance at mediation with Judge Arpert.	4	\$1,200.00	Fee	33.33%	\$400.00	25%	\$	300.00		
432	5/15/2014	SMZ	Conference with Will Rubley re discussion about case after mediation/file update.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
433	5/15/2014	SMZ	Preparation for mediation/meeting with Will Rubley.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
434	5/15/2014	WPR	Travel to and attend the settlement conference before Judge Arpert.	4	\$1,200.00	Fee	33.33%	\$400.00	25%	\$	300.00		
435	5/15/2014	WPR	Review the settlement memo and the pleadings and the summary judgment memos as preparation for the settlement conference.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00		
436	5/16/2014	WPR	Continue to prepare opposition to the summary judgment motions; pull research on the burden of proof for payment history under RESPA and the FDCPA.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		
437	5/21/2014	WPR	E-mail with counsel scheduling expert	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50		\$ 22.50
438	5/21/2014	WPR	Telephone call with Kelner.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
439	5/21/2014	WPR	Initial review of expert report of Marix emotional distress expert.	1.2	\$360.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
440	5/22/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50		
441	5/27/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	4.2	\$1,260.00	Fee	33.33%	\$420.00	25%	\$	315.00		
442	5/28/2014	WPR	Telephone call and e-mails with Tabakin.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
443	5/28/2014	WPR	Continue to prepare the opposition to the motions for summary judgment.	2.6	\$780.00	Fee	33.33%	\$260.00	25%	\$	195.00		
444	5/29/2014	WPR	Review the certification from	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
445	5/29/2014	WPR	Telephone call with Kelner.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
446	5/29/2014	WPR	Continue to prepare the opposition to the Zucker summary judgment motion; review research concerning the fair foreclosure act and the FDCPA.	4.2	\$1,260.00	Fee	100.00%	\$1,260.00	100%	\$	1,260.00		\$ 1,260.00
447	5/30/2014	WPR	Multiple telephone calls with Kelner.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
448	5/30/2014	WPR	E-mails with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50		\$ 22.50
449	6/2/2014	WPR	Continue to prepare the oppositions to the summary judgment motions.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		

450	6/4/2014	WPR	Continue to draft the responses to summary judgment motions by Zucker and by EMC.	3.6	\$1,080.00	Fee	50.00%	\$540.00	50%	\$	540.00	\$	540.00
451	6/5/2014	WPR	Continue to prepare the opposition to the Motions for Summary Judgment.	2.8	\$840.00	Fee	33.33%	\$280.00	25%	\$	210.00		
452	6/9/2014	WPR	Continue to draft the opposition to the summary judgment motions.	2.4	\$720.00	Fee	33.33%	\$240.00	25%	\$	180.00		
453	6/10/2014	SMZ	Telephone conference with Eric Kelner re settlement discussions/meeting with Will Rubley.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
454	6/10/2014	WPR	Telephone call with Tabakin.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
455	6/10/2014	WPR	Telephone call with Kelner.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
456	6/10/2014	WPR	Continue to prepare the opposition to the summary judgment motion.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		
457	6/13/2014	WPR	Review e-mail from counsel for EMC and review Certification.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
458	6/14/2014	WPR	Continue to draft responses to summary judgment motions by EMC and Residential.	4.5	\$1,350.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
459	6/14/2014	WPR	Prepare e-mail to the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
460	6/15/2014	WPR	Continue to research and draft responses to summary judgment motions.	5.5	\$1,650.00	Fee	33.33%	\$550.00	25%	\$	412.50		
461	6/16/2014	WPR	Finalize the opposition to the Motions for Summary Judgment filed by Zucker and	3.8	\$1,140.00	Fee	50.00%	\$570.00	50%	\$	570.00	\$	570.00
462	6/17/2014	WPR	Read all oppositions to Plaintiff's Motion for Summary Judgment and begin to prepare outline for the reply.	3.2	\$960.00	Fee	33.33%	\$320.00	25%	\$	240.00		
463	6/18/2014	WPR	Pull research on the GLBA and the issue of collectability of post-petition attorneys fees and costs.	4.5	\$1,350.00	Fee	33.33%	\$450.00	25%	\$	337.50	\$	337.50
464	6/19/2014	WPR	Continue to research the issues raised in all three responses to Plaintiff's Motion for Summary Judgment; begin to prepare the reply.	2.8	\$840.00	Fee	33.33%	\$280.00	25%	\$	210.00		
465	6/20/2014	WPR	Continue to draft the reply memorandum of	3.4	\$1,020.00	Fee	33.33%	\$340.00	25%	\$	255.00		
466	6/21/2014	WPR	Continue to prepare the reply memorandum of law.	5.5	\$1,650.00	Fee	33.33%	\$550.00	25%	\$	412.50		
467	6/22/2014	WPR	Continue to prepare the reply memorandum of law and pull research on the obligations of the Plaintiff to amend pleadings and to amend answers to discovery; draft reply and send the same for review.	6	\$1,800.00	Fee	33.33%	\$600.00	25%	\$	450.00		
468	6/23/2014	WPR	Finalize the Reply Memorandum of Law and the Certification and Exhibits; file the same.	2.8	\$840.00	Fee	33.33%	\$280.00	25%	\$	210.00		
469	7/2/2014	WPR	Prepare e-mail to Kelner.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
470	7/3/2014	WPR	Telephone call with the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
471	7/21/2014	WPR	Review the report from Chip Morrow and pull research on the net opinion rule; begin to prepare questions for his deposition.	2.8	\$840.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-



472	7/22/2014	WPR	Telephone call with the client.	0.6	\$180.00	Fee	33.33%	\$60.00	25%	\$	45.00	\$	45.00
473	7/22/2014	WPR	Continue to prepare the questions for Chip Morrow; pull research on other matters where Chip Morrow testified.	1.6	\$480.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
474	7/23/2014	WPR	Review e-mail from Kelner; check dates for availability.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
475	7/24/2014	WPR	Prepare e-mail to Kelner.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
476	8/6/2014	WPR	Telephone call with the client.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
477	8/8/2014	WPR	Prepare e-mail to Kelner regarding deposition of Morrow.	0.1	\$30.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
478	9/2/2014	WPR	[CS] Meet with Will Rubley to discuss case status and upcoming deposition of defendant's expert; review defendant's expert opinion; conduct legal research on the standard for expert opinions; determine what qualifies as a net opinion vs. an expert opinion; prepare legal memorandum re same.	2.5	\$337.50	Fee	33.33%	\$112.50	25%	\$	84.38	\$	84.38
479	9/2/2014	WPR	Draft Notice of Deposition to Morrow; e-mails to and from Kelner.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
480	9/3/2014	WPR	Finish up the Deposition Notice to Morrow; send the same.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
481	9/3/2014	WPR	Prepare e-mail to the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
482	9/5/2014	WPR	[CS] Review Motions for Summary Judgment, responses in Opposition to Motion for Summary Judgment, and Reply to Defendant's Response in Opposition to Plaintiff's Motion for Summary Judgment; procure and review Motions to Exclude Expert Opinions of Plaintiff's Expert filed in other jurisdictions; begin to prepare questions to ask Defendant's	4	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00	\$	135.00
483	9/5/2014	WPR	E-mail with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
484	9/10/2014	WPR	Review the court's order and telephone call with the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
485	9/11/2014	WPR	Prepare the settlement statement for Judge	2.8	\$840.00	Fee	33.33%	\$280.00	25%	\$	210.00	\$	210.00
486	9/11/2014	WPR	E-mail with Sayles.	0.1	\$30.00	Fee	100.00%	\$30.00	100%	\$	30.00	\$	30.00
487	9/12/2014	WPR	[CS] Continue to prepare questions for the deposition of opposing counsel's expert.	1.5	\$202.50	Fee	0.00%	\$0.00	0%	\$	-	\$	-
488	9/12/2014	WPR	Finalize the settlement statement for Judge	1.4	\$420.00	Fee	33.33%	\$140.00	25%	\$	105.00	\$	105.00
489	9/12/2014	WPR	E-mail from all parties regarding the settlement conference.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
490	9/15/2014	WPR	[CS] Continue to prepare questions for the deposition of opposing counsel's expert.	3	\$405.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
491	9/15/2014	WPR	Telephone call with Kelner.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
492	9/16/2014	WPR	E-mails with all counsel regarding settlement conference.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
493	9/17/2014	WPR	Telephone call with the client.	0.6	\$180.00	Fee	33.33%	\$60.00	25%	\$	45.00	\$	45.00
494	9/19/2014	SMZ	Conference with Will Rubley re strategy session on mediation and going forward.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50		
495	9/22/2014	WPR	E-mails with all parties.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
496	9/29/2014	WPR	Review the settlement memorandum to Judge Shipp.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		

497	9/30/2014	SMZ	Conference with Will Rubley re discussion about settlement conference and submission.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50		
498	9/30/2014	WPR	Make changes to the Settlement Agreement.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00		
499	10/1/2014	JPL	Review and revise letter to judge re settlement conference (history of case and issues etc.)	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50		
500	10/1/2014	WPR	Finalize the settlement letter to Judge Shipp and fax the same to the Judge's chambers.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00		
501	10/7/2014	SMZ	Review of complaint and summary judgment motion re preparation for settlement discussions.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
502	10/7/2014	WPR	Final preparation for the settlement conference; telephone call with the client.	2.1	\$630.00	Fee	33.33%	\$210.00	25%	\$	157.50		
503	10/8/2014	WPR	Travel to and attend the Settlement Conference with Judge Shipp.	7.5	\$2,250.00	Fee	33.33%	\$750.00	25%	\$	562.50		
504	10/10/2014	WPR	Begin to prepare the settlement documents.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00		
505	10/15/2014	WPR	Continue to prepare the settlement documents; e-mails to and from the client.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00		
506	10/27/2014	WPR	E-mails from Kelner.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
507	10/27/2014	WPR	Continue to prepare the settlement agreements.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00		
508	10/28/2014	WPR	Continue to prepare the settlement agreements.	1.2	\$360.00	Fee	33.33%	\$120.00	25%	\$	90.00		
509	11/3/2014	WPR	Continue drafting the settlement agreements; e-mail with Kelner.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		
510	11/4/2014	WPR	Finalize the settlement agreements and send the same to all parties.	3.6	\$1,080.00	Fee	33.33%	\$360.00	25%	\$	270.00		
511	11/7/2014	WPR	E-mails with the clients and e-mail with	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
512	11/7/2014	WPR	Review the proposed changes from Kelner on the	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
513	11/10/2014	WPR	E-mails with Sayles and Tabakin.	0.2	\$60.00	Fee	50.00%	\$30.00	50%	\$	30.00		\$ 30.00
514	11/11/2014	WPR	Telephone conference with the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00		\$ 15.00
515	11/17/2014	WPR	Telephone conference with Tabakin.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
516	11/19/2014	WPR	Telephone conference with Tabakin.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
517	11/21/2014	WPR	E-mails with Sayles and Tabakin; e-mails to and from the client.	0.4	\$120.00	Fee	50.00%	\$60.00	50%	\$	60.00		\$ 60.00
518	11/25/2014	WPR	[CS] Conduct legal research on motion to enforce settlement; conduct legal research on motion to reopen case after an Order dismissing the action without prejudice was entered by the court; prepare Motion to	4.5	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		
519	11/25/2014	WPR	Review the proposed agreements from Tabakin; e-mails to Tabakin; telephone call with Tabakin and with Kelner; review letters from Tabakin and Kelner to Judge Shipp.	0.9	\$270.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
520	11/25/2014	WPR	Begin to prepare the Motion to Restore the case to the active docket.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00		\$ 60.00
521	11/26/2014	WPR	[CS] Finalize motion to reopen matter and prepare same for filing.	1	\$200.00	Fee	33.33%	\$66.67	25%	\$	50.00		\$ 50.00



522	11/26/2014	WPR	Finalize the motion to reinstate case and file same.	4.2	\$1,260.00	Fee	33.33%	\$420.00	25%	\$	315.00	\$	315.00
523	11/26/2014	WPR	Draft letter to Judge Shipp.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00	\$	60.00
524	12/18/2014	WPR	Review letter from Sayles.	0.1	\$30.00	Fee	100.00%	\$30.00	100%	\$	30.00	\$	30.00
525	12/19/2014	WPR	Initial review of the Cross Motion to Enforce Settlement.	1	\$300.00	Fee	33.33%	\$100.00	25%	\$	75.00		
526	12/19/2014	WPR	Meet with Sidelsky; review the electric bill from the client; initial review of the Motion for Financing of the Insurance Premiums.	0.5	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50		
527	12/22/2014	WPR	Pull research on the Cross Motion to Approve Settlement.	1.3	\$390.00	Fee	33.33%	\$130.00	25%	\$	97.50		
528	1/3/2015	WPR	Pull research on the Motion to Enforce Settlement.	2.5	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50		
529	1/5/2015	WPR	Continue to draft the response to the cross motion to enforce settlement.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50		
530	1/6/2015	WPR	Continue to pull research on the settlement of certain claims against certain defendants when the claims are co-dependent on non-settling claims.	2.2	\$660.00	Fee	33.33%	\$220.00	25%	\$	165.00		
531	1/6/2015	WPR	Review the Motion to Enforce Settlement by Marix.	1.5	\$450.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
532	1/6/2015	WPR	Review the Motion to Enforce Settlement by Zucker.	1.9	\$570.00	Fee	100.00%	\$570.00	100%	\$	570.00		
533	1/7/2015	WPR	Continue to research motions to approve settlement and to prepare the opposition to the same.	4.5	\$1,350.00	Fee	33.33%	\$450.00	25%	\$	337.50		
534	1/8/2015	WPR	Continue to draft opposition to the Motions to Enforce Settlement.	1.3	\$390.00	Fee	33.33%	\$130.00	25%	\$	97.50		
535	1/9/2015	WPR	Continue to draft the Response to the Motion to Enforce Settlements.	2.6	\$780.00	Fee	33.33%	\$260.00	25%	\$	195.00		
536	1/12/2015	WPR	Telephone call with all counsel and letter to the court; fax and file the letter to the court.	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00	\$	60.00
537	1/13/2015	WPR	Telephone call with the court.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
538	1/13/2015	WPR	Telephone call with the court and e-mails to all parties.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
539	1/13/2015	WPR	Telephone call with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
540	1/14/2015	SMZ	Review various e-mails back and forth to set up a hearing date.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
541	1/14/2015	WPR	E-mails with Sayles.	0.2	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
542	1/14/2015	WPR	E-mails to and from all parties.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
543	1/15/2015	WPR	Telephone call with the client.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$	22.50
544	1/16/2015	WPR	Telephone call with the court.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
545	1/16/2015	WPR	E-mails to all counsel.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
546	1/22/2015	WPR	E-mail with Kelner and telephone call with the court.	0.2	\$60.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
547	2/10/2015	WPR	Research on the empty chair defense.	1.4	\$420.00	Fee	33.33%	\$140.00	25%	\$	105.00	\$	105.00
548	2/16/2015	WPR	Continue research on the empty chair defense; draft letter to Judge Shipp regarding settlement conference.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00		

549	2/17/2015	WPR	Finalize letter to Judge Shipp and prepare for the settlement conference.	2.3	\$690.00	Fee	33.33%	\$230.00	25%	\$	172.50	\$	172.50
550	2/18/2015	WPR	[CS] Telephone conference with Will Rubley to discuss terms of settlement with Marix and Zucker.	0.1	\$20.00	Fee	50.00%	\$10.00	50%	\$	10.00		
551	2/18/2015	WPR	[CS] Telephone conference with Will Rubley to discuss terms of settlement with EMC and Residential.	0.1	\$20.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
552	2/18/2015	SMZ	Travel to and appearance at settlement conference.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00		
553	2/18/2015	WPR	Final preparation for the settlement	0.8	\$240.00	Fee	33.33%	\$80.00	25%	\$	60.00	\$	60.00
554	2/18/2015	WPR	Travel to and attend the settlement conference before Judge Shipp.	4.1	\$1,230.00	Fee	33.33%	\$410.00	25%	\$	307.50		
555	2/22/2015	WPR	Begin to prepare the responses to the Motions to Enforce Settlement.	1.8	\$540.00	Fee	33.33%	\$180.00	25%	\$	135.00		
556	2/25/2015	WPR	Review outstanding discovery from EMC and Residential and review status of the case in light of the failed settlement.	2.4	\$720.00	Fee	33.33%	\$240.00	25%	\$	180.00		
557	2/27/2015	WPR	Continue to draft the opposition to the Motion to Enforce Settlement.	2.2	\$660.00	Fee	33.33%	\$220.00	25%	\$	165.00		
558	2/28/2015	WPR	Continue to draft the opposition to the cross motions to settle or to enforce settlement.	2.8	\$840.00	Fee	33.33%	\$280.00	25%	\$	210.00		
559	3/2/2015	WPR	Continue to draft the Opposition to the three Motions to Enforce Settlement.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50		
560	3/3/2015	WPR	Finalize the opposition to the three cross motions to enforce settlement and file the same; send a courtesy copy to Judge Shipp.	4.6	\$1,380.00	Fee	33.33%	\$460.00	25%	\$	345.00		
561	3/11/2015	WPR	Review the reply briefs filed by EMC, Marix and Zucker; make notes on the replies.	2.4	\$720.00	Fee	33.33%	\$240.00	25%	\$	180.00	\$	180.00
562	3/12/2015	WPR	Final review of all replies and prepare sur-reply; multiple e-mails with all parties regarding the sur-reply and telephone call with the court; draft letter to the court regarding sur reply and file the letter and	3.4	\$1,020.00	Fee	33.33%	\$340.00	25%	\$	255.00	\$	255.00
563	3/12/2015	WPR	Telephone call with Kelner.	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
564	4/7/2015	WPR	E-mails to and from the client.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$	15.00
565	4/23/2015	WPR	Telephone call with the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00	\$	30.00
566	5/7/2015	WPR	Review the court order requesting oral argument. Pull motions and all replies to the Motion and pull the summary judgment motions and begin to	0.9	\$270.00	Fee	33.33%	\$90.00	25%	\$	67.50		
567	5/11/2015	WPR	Emails with all parties regarding the return date of the pending Motions.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50
568	5/12/2015	WPR	Emails to all parties regarding the return dates on the Motion to Reopen and Motions to Enforce.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$	7.50

569	5/14/2015	WPR	Continue to prepare for the oral arguments on the Motion to Reopen and Motions to Enforce Settlement. Review the summary judgment motions.	2.1	\$630.00	Fee	33.33%	\$210.00	25%	\$	157.50	
570	5/19/2015	SMZ	Prepare for hearing on motion to reopen/discuss with Will Rubley.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$ 22.50
571	5/19/2015	SMZ	Travel to and appear at hearing for motion to reopen.	3	\$900.00	Fee	33.33%	\$300.00	25%	\$	225.00	\$ 225.00
572	5/19/2015	WPR	Travel to and attend the hearing in Trenton.	3.5	\$1,050.00	Fee	33.33%	\$350.00	25%	\$	262.50	\$ 262.50
573	5/19/2015	WPR	Final prep for the hearing. Review the pending motions and the motions for summary judgment.	1.4	\$420.00	Fee	33.33%	\$140.00	25%	\$	105.00	
574	5/19/2015	WPR	Email and telephone call with the client.	0.6	\$180.00	Fee	33.33%	\$60.00	25%	\$	45.00	\$ 45.00
575	5/28/2015	WPR	Telephone call with Kelner regarding	0.4	\$120.00	Fee	0.00%	\$0.00	0%	\$	-	\$ -
576	6/24/2015	WPR	Email with all counsel.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$ 7.50
577	6/29/2015	WPR	Email all counsel regarding the conference call with the court.	0.1	\$30.00	Fee	33.33%	\$10.00	25%	\$	7.50	\$ 7.50
578	6/30/2015	WPR	Conference call with Judge Arpert.	0.6	\$180.00	Fee	33.33%	\$60.00	25%	\$	45.00	\$ 45.00
579	7/1/2015	WPR	Review scheduling order from Alpert.	0.2	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$ 15.00
580	7/8/2015	WPR	[CS] Prepare and file entry of appearance	0.3	\$60.00	Fee	33.33%	\$20.00	25%	\$	15.00	\$ 15.00
581	8/5/2015	WPR	Review the bankruptcy petition of Zucker Goldberg & Ackerman.	1.8	\$540.00	Fee	100.00%	\$540.00	100%	\$	540.00	\$ 540.00
582	8/6/2015	WPR	Begin to prepare the Motion for Stay Relief. Pull forms from Westlaw and case law.	2.5	\$750.00	Fee	100.00%	\$750.00	100%	\$	750.00	\$ 750.00
583	8/7/2015	WPR	Continue to draft the Motion for Stay Relief.	1.6	\$480.00	Fee	100.00%	\$480.00	100%	\$	480.00	\$ 480.00
584	8/17/2015	WPR	Email with all counsel regarding the conference call. Telephone call with Judge Arpert/Es chambers.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$ 22.50
585	8/20/2015	WPR	Prepare for the conference call with the court.	0.3	\$90.00	Fee	33.33%	\$30.00	25%	\$	22.50	\$ 22.50
586	8/20/2015	WPR	Conference call with Judge Arpert.	0.7	\$210.00	Fee	33.33%	\$70.00	25%	\$	52.50	\$ 52.50
587	8/20/2015	WPR	Pull research on Motion to Vacate Reference.	2.5	\$750.00	Fee	100.00%	\$750.00	100%	\$	750.00	
588	9/2/2015	WPR	Continue to research motions to withdraw the reference.	2.6	\$780.00	Fee	100.00%	\$780.00	100%	\$	780.00	
589	9/14/2015	WPR	Continue to draft the Motion to Withdraw the Reference.	2	\$600.00	Fee	100.00%	\$600.00	100%	\$	600.00	
590	9/15/2015	WPR	Telephone call with Kelner.	0.4	\$120.00	Fee	100.00%	\$120.00	100%	\$	120.00	\$ 120.00
591	9/29/2015	WPR	[CS] Conduct legal research on the withdraw of reference from Bankruptcy.	2	\$400.00	Fee	100.00%	\$400.00	100%	\$	400.00	
592	9/30/2015	WPR	[CS] Prepare motion to withdraw reference.	4	\$800.00	Fee	100.00%	\$800.00	100%	\$	800.00	
593	10/5/2015	WPR	[CS] Discuss same with Will Rubley.	0.3	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	
594	10/5/2015	WPR	[CS] Conduct additional research on the mandatory withdraw of the reference.	1	\$200.00	Fee	100.00%	\$200.00	100%	\$	200.00	
595	10/5/2015	WPR	[CS] Make necessary corrections and additions to the memorandum of law in support of the motion.	3	\$600.00	Fee	100.00%	\$600.00	100%	\$	600.00	
596	10/6/2015	WPR	Review the Motion to withdraw the Reference.	2.2	\$660.00	Fee	100.00%	\$660.00	100%	\$	660.00	
597	10/8/2015	WPR	[CS] Final review the motion to withdraw. Review citations and shepardize case law. Prepare table of contents and table of authorities.	4.5	\$900.00	Fee	100.00%	\$900.00	100%	\$	900.00	
598	10/8/2015	WPR	Call with the bankruptcy court.	0.3	\$90.00	Fee	100.00%	\$90.00	100%	\$	90.00	

599	10/8/2015	WPR	Final review of the Motion to Withdraw the Reference.	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00		
600	10/9/2015	WPR	[CS] Prepare letter to Judge Shipp enclosing copy of the motion to withdraw reference. Organize motion and exhibits to send to Judge.	0.6	\$120.00	Fee	100.00%	\$120.00	100%	\$	120.00		
601	10/9/2015	WPR	Review the rules for service of the Motion to Withdraw the Reference.	0.4	\$120.00	Fee	100.00%	\$120.00	100%	\$	120.00		
602	10/15/2015	WPR	[CS] Review Zucker's response to Rhodes' motion to withdraw.	0.2	\$40.00	Fee	100.00%	\$40.00	100%	\$	40.00		
603	10/15/2015	WPR	Review the opposition to the Motion to Withdraw the reference. Pull cases on related to jurisdiction of the bankruptcy court and	2.5	\$750.00	Fee	100.00%	\$750.00	100%	\$	750.00		
604	10/16/2015	WPR	Finalize the reply to the Motion to Withdraw the reference and file the same.	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00		
605	10/16/2015	WPR	Review the sur-reply filed by Zucker.	0.4	\$120.00	Fee	100.00%	\$120.00	100%	\$	120.00		\$ 120.00
606	11/23/2015	WPR	Review the order from the district court denying the Motion to Withdraw the Reference.	0.5	\$150.00	Fee	100.00%	\$150.00	100%	\$	150.00		
607	12/3/2015	WPR	Draft and file the proof of claim.	0.5	\$150.00	Fee	100.00%	\$150.00	100%	\$	150.00		\$ 150.00
608	1/11/2016	WPR	Begin to draft the Motion to Reconsider / Motion for Stay Relief.	3.5	\$1,050.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
609	7/28/2016	WPR	Review the Motions filed in Zucker bankruptcy relating to malpractice claims.	1.5	\$450.00	Fee	100.00%	\$450.00	100%	\$	450.00		\$ 450.00
610	7/29/2016	WPR	Continue to research the Motion for Stay	1.3	\$390.00	Fee	100.00%	\$390.00	100%	\$	390.00		\$ 390.00
611	9/7/2016	WPR	Telephone call with the client.	0.4	\$120.00	Fee	33.33%	\$40.00	25%	\$	30.00		\$ 30.00
612	9/8/2016	WPR	Draft the Motion for Stay Relief	2.8	\$840.00	Fee	100.00%	\$840.00	100%	\$	840.00		\$ 840.00
613	9/27/2016	WPR	Telephone call with Tabakin.	0.3	\$90.00	Fee	0.00%	\$0.00	0%	\$	-		\$ -
614	12/13/2016	WPR	Check status of bankruptcy matter and telephone call with the court. Pull forms on Motion for Stay	1.3	\$390.00	Fee	100.00%	\$390.00	100%	\$	390.00		\$ 390.00
615	12/20/2016	WPR	Continue to draft the Motion for Stay Relief.	2.1	\$630.00	Fee	100.00%	\$630.00	100%	\$	630.00		\$ 630.00
616	12/23/2016	WPR	Continue to prepare the Motion for Stay	3.7	\$1,110.00	Fee	100.00%	\$1,110.00	100%	\$	1,110.00		\$ 1,110.00
617	12/30/2016	WPR	Continue to prepare the Motion for Stay	1.7	\$425.00	Fee	100.00%	\$425.00	100%	\$	425.00		\$ 425.00
618	1/8/2017	WPR	Finalize the Motion for Stay Relief and prepare the same for filing. Pull information regarding applicable insurance policies.	2.5	\$625.00	Fee	100.00%	\$625.00	100%	\$	625.00		\$ 625.00
619	1/12/2017	WPR	Telephone call with bankruptcy counsel for Zucker.	0.2	\$50.00	Fee	100.00%	\$50.00	100%	\$	50.00		\$ 50.00
620	1/12/2017	WPR	Telephone message for Adler.	0.1	\$25.00	Fee	100.00%	\$25.00	100%	\$	25.00		
621	1/13/2017	WPR	Email to the client.	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50		\$ 12.50
622	1/26/2017	WPR	Check status of the pending Motion for Stay Relief.	0.3	\$75.00	Fee	100.00%	\$75.00	100%	\$	75.00		\$ 75.00
623	1/27/2017	WPR	Telephone call with bankruptcy counsel.	0.2	\$50.00	Fee	100.00%	\$50.00	100%	\$	50.00		\$ 50.00
624	1/31/2017	WPR	Email from bankruptcy counsel. Check status of motion . Response to email.	0.3	\$75.00	Fee	100.00%	\$75.00	100%	\$	75.00		\$ 75.00
625	2/6/2017	WPR	Emails with bankruptcy counsel and check status of motion.	0.5	\$125.00	Fee	100.00%	\$125.00	100%	\$	125.00		\$ 125.00

626	3/3/2017	WPR	Telephone call with the court and review the court order.	0.6	\$150.00	Fee	100.00%	\$150.00	100%	\$	150.00	\$	150.00
627	3/8/2017	WPR	Pull research on Motion to Reopen case.	2.3	\$575.00	Fee	33.33%	\$191.67	25%	\$	143.75	\$	143.75
628	3/9/2017	WPR	Telephone call with the court.	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
629	3/15/2017	WPR	Prepare and send revised order to the Judge in the bankruptcy court.	0.2	\$50.00	Fee	100.00%	\$50.00	100%	\$	50.00	\$	50.00
630	3/15/2017	WPR	Continue to draft the Motion to Reinstate the District Court Action.	3	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50	\$	187.50
631	3/16/2017	WPR	Continue to pull research on the good cause standard to reopen the district court action. Review the docket and pull the order dismissing the case.	1.3	\$325.00	Fee	33.33%	\$108.33	25%	\$	81.25	\$	81.25
632	3/17/2017	WPR	Draft the Motion to Reopen.	0.5	\$125.00	Fee	33.33%	\$41.67	25%	\$	31.25	\$	31.25
633	4/17/2017	WPR	Finalize and file the Motion to Reopen.	2.6	\$650.00	Fee	33.33%	\$216.67	25%	\$	162.50	\$	162.50
634	4/17/2017	WPR	Pull research on the standard of good cause for motion to reopen administratively dismissed case.	3	\$750.00	Fee	33.33%	\$250.00	25%	\$	187.50	\$	187.50
635	4/18/2017	WPR	File and serve the Motion to Reopen.	0.8	\$200.00	Fee	33.33%	\$66.67	25%	\$	50.00	\$	50.00
636	4/25/2017	WPR	Review letters from Zucker and Marix to the clerk. Pull research on dispositive motions. Draft and file a response to the two 7.1 letters.	1.4	\$350.00	Fee	50.00%	\$175.00	50%	\$	175.00	\$	175.00
637	5/22/2017	WPR	Review the opposition to the Motion to Reopen filed by Marix.	1.5	\$375.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
638	5/22/2017	WPR	Pull research on the cases cited by Marix in its brief. Review the records for the factual statements asserted by Marix.	2.2	\$550.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
639	5/23/2017	WPR	Review the Opposition to the Motion to Reopen filed by Zucker. Pull cases cited by Zucker. Pull research on the requirement that a motion cite to a certification or affidavit from the client. Pull research on the standard of good cause and pull cases cited by Marix in its opposition to the Motion to Reopen.	6.2	\$1,550.00	Fee	100.00%	\$1,550.00	100%	\$	1,550.00	\$	1,550.00
640	5/25/2017	WPR	Review and revise the Reply to the Motion to Reopen.	1.8	\$450.00	Fee	50.00%	\$225.00	50%	\$	225.00	\$	225.00
641	5/26/2017	WPR	Finalize and file the Reply Memorandum of	1.3	\$325.00	Fee	50.00%	\$162.50	50%	\$	162.50	\$	162.50
642	5/26/2017	WPR	Telephone call with Kelner.	0.3	\$75.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
643	7/13/2017	WPR	Emails with the client regarding status of the case.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
644	8/25/2017	WPR	Review the Memorandum and Order reopening the case. Review file and docket report for status of pending matters.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
645	8/28/2017	WPR	Telephone call with Judge Arpert's chambers and letter to the Judge.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
646	8/30/2017	WPR	Emails with the court and all parties regarding the	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
647	9/6/2017	WPR	Review the Henson v. Santander decision.	1.1	\$275.00	Fee	33.33%	\$91.67	25%	\$	68.75		
648	9/8/2017	WPR	Review file and prepare for conference call with the court. Send email to all parties.	0.5	\$125.00	Fee	33.33%	\$41.67	25%	\$	31.25	\$	31.25
649	9/8/2017	WPR	Conference call with the court.	0.4	\$100.00	Fee	33.33%	\$33.33	25%	\$	25.00	\$	25.00

650	9/11/2017	WPR	Draft letter to Judge Apert and send the same to all parties for approval.	0.5	\$125.00	Fee	33.33%	\$41.67	25%	\$	31.25	\$	31.25
651	9/14/2017	WPR	Emails with counsel and send letter and file letter to the Judge.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
652	11/29/2017	WPR	Check status of pending motions.	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
653	12/18/2017	WPR	Telephone call with Tabakin.	0.2	\$50.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
654	2/19/2018	WPR	Pull summary judgment motions and review documents.	2	\$700.00	Fee	33.33%	\$233.33	25%	\$	175.00		
655	2/19/2018	WPR	Email with the client regarding offer.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
656	2/19/2018	WPR	Pull summary judgment motions and review documents.	2	\$500.00	Fee	33.33%	\$166.67	25%	\$	125.00		
657	2/20/2018	WPR	Pull Henson v. Santander and related cases to prepare for oral argument on Motions for Summary Judgment.	2.8	\$700.00	Fee	33.33%	\$233.33	25%	\$	175.00	\$	175.00
658	2/21/2018	WPR	Review all summary judgment filings and all responses. Prepare outline for argument. Review the Henson and Beard decisions and pull the legislative history of the FDCPA. Review case law and statutes cited in the	7.8	\$1,950.00	Fee	33.33%	\$650.00	25%	\$	487.50		
659	2/21/2018	WPR	Telephone call with the client.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
660	2/22/2018	WPR	Final prep for oral argument on pending summary judgment motions.	2	\$500.00	Fee	33.33%	\$166.67	25%	\$	125.00		
661	2/22/2018	WPR	Travel to and attend oral argument on pending summary judgment motions.	4.5	\$1,125.00	Fee	33.33%	\$375.00	25%	\$	281.25	\$	281.25
662	2/23/2018	AC	Began reviewing case file in preparation for trial prep.	1.7	\$425.00	Fee	33.33%	\$141.67	25%	\$	106.25	\$	106.25
663	2/26/2018	AC	Continued reviewing Rhodes file.	2.3	\$575.00	Fee	33.33%	\$191.67	25%	\$	143.75	\$	143.75
664	2/27/2018	WPR	Telephone call with the client.	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
665	2/27/2018	WPR	Pull expert reports and review. Begin to prepare for the deposition of Morrow.	1.5	\$375.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
666	2/28/2018	AC	Continued reviewing file materials.	0.8	\$200.00	Fee	33.33%	\$66.67	25%	\$	50.00	\$	50.00
667	3/1/2018	WPR	Emails with all counsel.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
668	3/1/2018	AC	Reviewed our produced documents.	4	\$1,000.00	Fee	33.33%	\$333.33	25%	\$	250.00	\$	250.00
669	3/12/2018	WPR	Letter from Zucker to Judge Thompson.	0.2	\$50.00	Fee	100.00%	\$50.00	100%	\$	50.00	\$	50.00
670	3/14/2018	WPR	Pull, organize, and review file for outstanding discovery and other issues to be tried.	2	\$500.00	Fee	33.33%	\$166.67	25%	\$	125.00	\$	125.00
671	3/19/2018	WPR	Emails with the client.	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
672	3/22/2018	WPR	Review the court order and the opinion.	2.5	\$625.00	Fee	33.33%	\$208.33	25%	\$	156.25	\$	156.25
673	3/23/2018	WPR	Pull and review file and all exhibits for proofs after summary judgment motion.	1.8	\$450.00	Fee	33.33%	\$150.00	25%	\$	112.50	\$	112.50
674	3/26/2018	WPR	Conference call with the court.	0.5	\$125.00	Fee	33.33%	\$41.67	25%	\$	31.25	\$	31.25
675	3/26/2018	WPR	Prepare for conference call with the court.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
676	3/27/2018	WPR	Email with the client and telephone call with the court.	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
677	3/28/2018	WPR	Telephone call with the court and telephone message for the client.	0.4	\$100.00	Fee	33.33%	\$33.33	25%	\$	25.00	\$	25.00
678	3/28/2018	WPR	Telephone call with the client.	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
679	3/28/2018	WPR	Telephone call with William Rhodes.	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50



680	4/2/2018	WPR	Emails with counsel for EMC	0.2	\$50.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
681	4/3/2018	WPR	Draft and file the confidential settlement memorandum	1	\$250.00	Fee	33.33%	\$83.33	25%	\$	62.50	\$	62.50
682	4/4/2018	WPR	Prepare for settlement conference	1.5	\$375.00	Fee	33.33%	\$125.00	25%	\$	93.75	\$	93.75
683	4/4/2018	WPR	Travel to and attend settlement conference in Trenton	5.3	\$1,325.00	Fee	33.33%	\$441.67	25%	\$	331.25	\$	331.25
684	4/5/2018	WPR	Telephone call with the client	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
685	5/2/2018	WPR	Pull, organize and review file in preparation for trial	4.1	\$1,025.00	Fee	33.33%	\$341.67	25%	\$	256.25	\$	256.25
686	5/7/2018	WPR	Emails with all counsel regarding depositions of experts	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
687	5/7/2018	WPR	Pull file and review the medical expert report	1.7	\$425.00	Fee	33.33%	\$141.67	25%	\$	106.25	\$	106.25
688	5/8/2018	WPR	Emails with all parties regarding scheduling of deposition of Marix Expert	0.5	\$125.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
689	5/8/2018	WPR	Set up reporter for the deposition	0.2	\$50.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
690	5/8/2018	WPR	Begin to prepare for deposition of Expert	2.5	\$625.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
691	5/9/2018	WPR	Telephone call with the client	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
692	5/10/2018	WPR	Emails with all parties	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
693	5/10/2018	WPR	Email from the client	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
694	5/14/2018	WPR	Emails with the court reporter	0.2	\$50.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
695	5/14/2018	WPR	Telephone call with Kelner	0.2	\$50.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
696	5/14/2018	WPR	Emails with all parties	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
697	5/14/2018	WPR	Emails and phone call with our expert	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
698	5/14/2018	WPR	Prepare for the deposition of the expert of	4	\$1,000.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
699	5/15/2018	WPR	Pull research on the net opinion rule and the daubert rule for expert testimony	3	\$750.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
700	5/15/2018	WPR	Review the scheduling order for trial	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
701	5/16/2018	WPR	Identify exhibits, make copies. Emails with court reporter and all parties	1.5	\$375.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
702	5/16/2018	WPR	Continue to prepare for deposition of Morrow	2.7	\$675.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
703	5/17/2018	WPR	Email to Kelner with settlement demands	0.2	\$50.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
704	5/17/2018	WPR	Final prep for deposition of Morrow	1	\$250.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
705	5/17/2018	WPR	Travel to and attend the deposition of Morrow, expert for Marix	5.2	\$1,300.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
706	5/18/2018	WPR	Review the invoice from the expert for Marix	0.3	\$75.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
707	5/22/2018	WPR	Emails to the expert	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
708	5/25/2018	WPR	Review letter from Sayles	0.3	\$75.00	Fee	100.00%	\$75.00	100%	\$	75.00	\$	75.00
709	5/25/2018	WPR	Telephone call with counsel from EMC	0.2	\$50.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
710	5/29/2018	WPR	Telephone call with the client	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
711	5/29/2018	WPR	Emails with the client	0.2	\$50.00	Fee	33.33%	\$16.67	25%	\$	12.50	\$	12.50
712	5/30/2018	WPR	Prepare and send the draft pre-trial order to the Defendants in the case	5.2	\$1,300.00	Fee	33.33%	\$433.33	25%	\$	325.00	\$	325.00
713	5/30/2018	EAC	Discussion with Will Rubley re: items needed for pretrial order; prepare jury instructions, including general instructions and specific instructions to RESPA and FDCPA counts	4.7	\$587.50	Fee	33.33%	\$195.83	25%	\$	146.88	\$	146.88
714	5/31/2018	WPR	Telephone call with the client	0.4	\$100.00	Fee	33.33%	\$33.33	25%	\$	25.00	\$	25.00
715	5/31/2018	WPR	Review and revise the Jury Instructions	1.5	\$375.00	Fee	33.33%	\$125.00	25%	\$	93.75	\$	93.75
716	5/31/2018	WPR	Review the financial statements from the client	0.6	\$150.00	Fee	33.33%	\$50.00	25%	\$	37.50	\$	37.50

717	5/31/2018	WPR	Emails with all counsel regarding extension of the deadline to file joint proposed pre-trial order. Emails also concerning the trial deposition of Zucker	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
718	5/31/2018	WPR	Review the financial statements and send the same to EMC's counsel	0.3	\$75.00	Fee	33.33%	\$25.00	25%	\$	18.75	\$	18.75
719	5/31/2018	WPR	Telephone call with Sayles	0.4	\$100.00	Fee	100.00%	\$100.00	100%	\$	100.00	\$	100.00
720	5/31/2018	WPR	Telephone call with Kelner	0.3	\$75.00	Fee	0.00%	\$0.00	0%	\$	-	\$	-
721	5/31/2018	EAC	Prepare voir dire questions and verdict form; make revisions to jury instructions; send documents to Will Rubley for review	2.3	\$287.50	Fee	33.33%	\$95.83	25%	\$	71.88	\$	71.88
722	6/1/2018	WPR	Zucker letter to the judge and review the court order	0.2	\$50.00	Fee	100.00%	\$50.00	100%	\$	50.00	\$	50.00
723	6/7/2018	EAC	Prepare report of all time entries since inception of case and f	0.2	\$25.00	Fee	100.00%	\$25.00	100%	\$	25.00	\$	25.00
724	6/12/2018	EAC	Review markup of timesheets from Will Rubley; make revision	1.5	\$187.50	Fee	100.00%	\$187.50	100%	\$	187.50	\$	187.50
725	6/14/2018	EAC	Research re: applying for fees plus enhanced fees with resepc	0.7	\$87.50	Fee	100.00%	\$87.50	100%	\$	87.50	\$	87.50
726	6/14/2018	WPR	Pull research on the enhancement of legal fees in fee shifting	1.3	\$455.00	Fee	100.00%	\$455.00	100%	\$	455.00	\$	455.00
727	6/15/2018	MM	Research - attorney fee/fee enhancements/respondent super	3.8	\$475.00	Fee	50.00%	\$237.50	50%	\$	237.50	\$	237.50
728	6/20/2018	EAC	Preparation of motion for reasonable attorney's fees plus enh	2.4	\$480.00	Fee	100.00%	\$480.00	100%	\$	480.00	\$	480.00
729	6/21/2018	EAC	Continue preparation of motion for attorney's	1.3	\$260.00	Fee	100.00%	\$260.00	100%	\$	260.00	\$	260.00
730	6/26/2018	EAC	Continue preparation of motion for attorneys'	0.3	\$60.00	Fee	100.00%	\$60.00	100%	\$	60.00	\$	60.00
731	6/28/2018	EAC	Continue preparation of motion for attorneys'	0.8	\$160.00	Fee	100.00%	\$160.00	100%	\$	160.00	\$	160.00
732	7/1/2018	EAC	Continue preparation of motion for attorney's	1.3	\$260.00	Fee	100.00%	\$260.00	100%	\$	260.00	\$	260.00
733	7/2/2018	EAC	Continue preparation of motion for attorney's	0.5	\$100.00	Fee	100.00%	\$100.00	100%	\$	100.00	\$	100.00
734	7/5/2018	EAC	Continue preparation of motion for attorney's	0.9	\$180.00	Fee	100.00%	\$180.00	100%	\$	180.00	\$	180.00
735	7/13/2018	EAC	Telephone call with Will Rubley re motion for attorneys' fees; continue preparation of motion and brief and send to Will Rubley for review.	2.4	\$480.00	Fee	100.00%	\$480.00	100%	\$	480.00	\$	480.00
736	7/19/2018	WPR	Initial review of the fee application. Make revisions.	1	\$350.00	Fee	100.00%	\$350.00	100%	\$	350.00	\$	350.00
737	7/20/2018	WPR	Final review of the fee application. Emails with Sayles.	1	\$350.00	Fee	100.00%	\$350.00	100%	\$	350.00	\$	350.00
738	7/27/2018	EAC	Prepare form of judgment; make final revisions to brief and update numbers for motion for attorneys' fees re Zucker.	0.4	\$80.00	Fee	100.00%	\$80.00	100%	\$	80.00	\$	80.00
739	3/15/2012	SMZ	Court filing fee for Complaint.	Flat Exp	\$350.00	Expense	33.33%	\$116.67	25%	\$	87.50	\$	87.50
740	3/23/2012	SMZ	Guaranteed Subpoena fees.	Flat Exp	\$69.95	Expense	33.33%	\$23.32	25%	\$	17.49	\$	17.49
741	4/11/2012	SMZ	Guaranteed Subpoena fees.	Flat Exp	\$129.90	Expense	33.33%	\$43.30	25%	\$	32.48	\$	32.48
742	6/13/2012	SMZ	Court fees.	Flat Exp	\$199.85	Expense	33.33%	\$66.62	25%	\$	49.96	\$	49.96
743	10/9/2012	SMZ	Regular mail postage for service of Second Amended Complaint and Exhibits.	Flat Exp	\$26.00	Expense	33.33%	\$8.67	25%	\$	6.50	\$	6.50
744	10/9/2012	SMZ	Certified mail postage for service of Second Amended Complaint and Exhibits.	Flat Exp	\$5.30	Expense	33.33%	\$1.77	25%	\$	1.33	\$	1.33
745	1/16/2013	SMZ	Postage costs.	Flat Exp	\$26.50	Expense	33.33%	\$8.83	25%	\$	6.63	\$	6.63
746	3/20/2013	SMZ	Mediation fee.	Flat Exp	\$1,000.00	Expense	33.33%	\$333.33	25%	\$	250.00	\$	250.00
747	4/17/2013	SMZ	Fee for request for medical records.	Flat Exp	\$232.37	Expense	33.33%	\$77.46	25%	\$	58.09	\$	58.09



748	4/17/2013	SMZ	Fee for copies of medical records.	Flat Exp	\$63.00	Expense	33.33%	\$21.00	25%	\$	15.75	\$	15.75
749	1/6/2014	SMZ	Payment to Dr. Pasahow.	Flat Exp	\$500.00	Expense	33.33%	\$166.67	25%	\$	125.00	\$	125.00
750	2/7/2014	SMZ	Transcript fees for 12/19/13 depositions.	Flat Exp	\$1,041.50	Expense	33.33%	\$347.17	25%	\$	260.38	\$	260.38
751	2/12/2014	SMZ	Status LLC fees.	Flat Exp	\$235.00	Expense	33.33%	\$78.33	25%	\$	58.75	\$	58.75
752	2/26/2014	SMZ	Transcript fees for 1/28/14 depositions of William & Melissa Rhodes.	Flat Exp	\$913.00	Expense	33.33%	\$304.33	25%	\$	228.25	\$	228.25
753	3/11/2014	SMZ	Transcript fees for 1/24/2014.	Flat Exp	\$834.25	Expense	33.33%	\$278.08	25%	\$	208.56	\$	208.56
754	3/18/2014	SMZ	Postage.	Flat Exp	\$36.75	Expense	33.33%	\$12.25	25%	\$	9.19	\$	9.19
755	3/19/2014	SMZ	Postage.	Flat Exp	\$50.07	Expense	33.33%	\$16.69	25%	\$	12.52	\$	12.52
756	4/17/2014	SMZ	Transcript fees for 2/19/14.	Flat Exp	\$660.50	Expense	33.33%	\$220.17	25%	\$	165.13	\$	165.13
757	6/13/2014	SMZ	FedEx expenses.	Flat Exp	\$53.11	Expense	33.33%	\$17.70	25%	\$	13.28	\$	13.28
758	6/20/2014	SMZ	Copying for service of Opposition to Summary Judgment Motions of Zucker and EMC.	Flat Exp	\$137.00	Expense	33.33%	\$45.67	25%	\$	34.25	\$	34.25
759	6/20/2014	SMZ	Postage for service of Opposition to Summary Judgment Motions of Zucker and EMC.	Flat Exp	\$16.45	Expense	33.33%	\$5.48	25%	\$	4.11	\$	4.11
760	6/23/2014	SMZ	Copying for service of Plaintiff's Reply.	Flat Exp	\$72.00	Expense	33.33%	\$24.00	25%	\$	18.00	\$	18.00
761	6/23/2014	SMZ	Postage for service of Plaintiff's Reply.	Flat Exp	\$16.45	Expense	33.33%	\$5.48	25%	\$	4.11	\$	4.11
762	11/26/2014	SMZ	Copying for service of Motion to Reopen	Flat Exp	\$27.00	Expense	33.33%	\$9.00	25%	\$	6.75	\$	6.75
763	11/26/2014	SMZ	Postage for service of Motion to Reopen Case.	Flat Exp	\$4.55	Expense	33.33%	\$1.52	25%	\$	1.14	\$	1.14
764	10/9/2015	SMZ	Postage.	Flat Exp	\$5.95	Expense	33.33%	\$1.98	25%	\$	1.49	\$	1.49
765	10/12/2015	SMZ	Filing fee for Motion to Withdraw Reference.	Flat Exp	\$176.00	Expense	33.33%	\$58.67	25%	\$	44.00		
766	1/9/2017	WPR	Filing fee for Motion for Relief from Stay in Zucker Goldberg bankruptcy case.	Flat Exp	\$181.00	Expense	33.33%	\$60.33	25%	\$	45.25	\$	45.25
767	5/16/2017	WPR	FedEx expenses.	Flat Exp	\$17.53	Expense	33.33%	\$5.84	25%	\$	4.38	\$	4.38
768	6/4/2018	CW	Court reporting/video and transcripts (Frederick Morrow II)	Flat Exp	\$2,228.50	Expense	33.33%	\$742.83	25%	\$	557.13	\$	557.13
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<b>Totals as calculated by Plaintiffs in their Moving Br.</b>						Total Expenses w/ 25% multiplier (No entries struck)	\$	2,327.37	Total Expenses (w/ entires struck)	\$	2,283.37
				Fees:	\$102,330.83	Total Fees w/ 25% multiplier (No entries struck)	\$	88,275.63	Total Fees (w/ entries struck)	\$	59,396.88
				Expenses:	\$3,103.16	SUM (no entries struck)	\$	90,603.00	<b>ADJUSTED TOTAL</b>	\$	61,680.25